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Issue Paper Comments

Integrated Water Resources Strategy

Karen Riggin (Citizen)
October 15, 2009 (email)

I have lived at Ironside, in Eastern Oregon for 46 years. As you will note this is in an area that does have a moratorium on part of its groundwater (cow valley). It is also an area that supposedly, along with most of the rest of the state, has intolerable levels of pollution in the streams. My family has lived here for over 100 years and we have seen many changes - both in climates, land usage patterns, variety and # of fish and wildlife, and population patterns in this area, most of which is part of historical data.

First of all I have a real problem with a statement on page 6 of your document under the purpose of the plan. It talks about the purpose of the plan relating to cost effectiveness, and environmental benefits and costs. I propose you add two more words into that sentence. The corrected version would read cost effectiveness, economic impact, and environmental benefits and costs. If the economics of the region is hurt then you saved the water for noone since they could no longer do business or live there, or pay taxes and contribute to the state economy. You talk about this being a priority later in your paper so I assume this was just an oversight.

My other problem is with your high dependence upon the "coming climatic changes". The climate is never a static thing. It is always changing and has always been changing. Unfortunately currently it has become a politically pressured issue. This has resulted in several "studies" being made and quoted where the end result was decided upon, then data collected to prove the point desired. Not sound science at all. There have actually been studies made proving opposite findings on our future climate changes. There was one study out of the PNW that was headlined in Oregon papers, I believe one paper was the Capitol Press, that concluded the climate changes were very different from the "politically correct" forecast. Unfortunately, I believe because of the politics involved there were reprecussions incurred by this professor for publisizing data "not politically correct". I am sorry but our local weather has not supported the theories either (snow sticking to the ground in Oct. for the first time in memory is not global warming). I do believe we should always be aware that our climates are not static and be prepared for changes, both small and radical, either direction. I do not believe we have the data available or the knoweldge of all the variables to reach our own accurate conclusions of the future. Numerous studies have proven that while man does not always help the climate of the world his affects are inconsequential to the effects of other sources. Not to say that he shouldn't try to limit his polluting but to say that once we do all in our power to limit this it won't affect the climate nearly as significantly as many claim.

Therefore I do not believe your wording on page 8 about the changes in precipitation are accurate enough to be included in this document. On page 34 the no and low regret strategies should not be adopted ahead of science with high degrees of probablility. This is an important document that will affect many businesses and lives in Oregon and there should be documno place in this document for conjectures and opionions, when strategies depend upon the facts.

By the way, part of the reason for our local streams being poluted could be the fact that some summers, they totally dry up due to lack of rainfall and snowpack, and other summers, like this

one, they continue running. For some reason this is also hard on the fish populations. Some of the scientific sampling techniques I've seen used in this area aren't too great either. Does it really show true average stream quality when you sample the stream right below where cattle are watering, along a county road, when the cattle are being driven on an annual drive to a different pasture? Not really.

Sincerely, Karen Riggin

Lynn Schoessler (Citizen)
September 15, 2009 (email)

I appreciate the effort; this is indeed needed critical thinking. The topic areas seem to be right on target as the essential points of consideration. What I didn't see addressed to any degree was the prospect of using water availability/quality/etc as a defining factor to design the state's growth – where and when. And to define the limit of the state's growth. Radical thinking to free market strategy, but,,,,

Probably should be noted this is a personal opinion.

Malcolm Drake (Citizen)
September 25, 2009 (email)

I'm very pleased that OWRD is addressing the future water needs of our state. Already we in Josephine County are seeing wells dry up, and most area streams (other than those in some Federal lands), are so low that fisheries values are seriously diminished.

Unfortunately, we do not have adequate data to realistically define what's happening to our aquifers; however, I've spoken to local companies who supply water-by tank truck-to properties whose wells fail in late summer/early fall. These folks tell me that their business is booming, with more and more well problems each year.

I've also analyzed well data (Josephine County) given to me by Ivan Gall, OWRD hydrogeologist. While not statistically valid, the fact is that the percentage of wells *deepened*, in relation to the number of wells that are *new*, has grown enormously. Before the mid 1950's the percentage of deepened wells was about zero. The last year I had data for, 2003(approximately; it's been a few year ago) had around ten or twelve percent of the wells drilled being deepenings. I can dig up the data, if anyone's interested.

One potential water storage site I've heard discussed is upper Jumpoff Joe Creek. This bears examination, because of the following potential benefits:

1. Jumpoff Joe Creek, now largely dry during late summer/early fall months, would be able to flow year round, thus restoring lost salmon habitat for some 10-15 miles its reach, in addition to generally improving the riparian area for this area. At this time, Jumpoff Joe's dry season flow rates are generally lower during a "normal" water year than they were during the major drought of 1977-1978, apparently due to ever growing numbers of wells in the watershed.
2. Hundreds of thousands of dollars worth of electric power would (likely) be available to help fund our county government. Oregon Dept of Energy has already funded a feasibility study for this project, which is "marginal" without a reservoir, but would more than double its potential, if OWRD were to build a small reservoir. The hydro facility would have the smallest environmental impact I've ever seen, and has received the blessings of Oregon Fish and Wildlife, Water Master, and any agencies who were consulted. It also has sufficient existing power lines nearby. Every expected roadblock failed to be a problem.
3. Jumpoff Joe Creek's water quality would be vastly improved-both temperature and bacteriologically speaking.
4. Aquifers in the JOJ/North Valley areas would get some recharge.
5. a significant water supply would be available for the Merlin/North Valley Unincorporated Community. This community is currently extremely water-challenged, which seriously affects its ability to supply its residents with water, and to enable job-creating businesses to locate there.

The county has prepared a study for water/sewer for the relatively new Merlin/North Valley Community Water Plan. The plan has narrowed down the options for a water supply to two: 1)

direct withdrawal from the Rogue River, at great expense, and purchasing water from the Corps of Engineers' Lost Creek Reservoir impoundments. 2) Purchasing Rogue River Water from the city of Grants Pass, which appears to be much more economically viable than the first option. Development of groundwater supplies appears to be completely unreasonable.

What surprises me is that this study did not look at the idea of the small reservoir on upper Jumpoff Joe Creek. This reservoir would be able to send at least twice as much water down Jumpoff Joe Creek right into downtown Merlin; no pipes, no pumping required. The Jumpoff Joe reservoir would be able to store enough water during high flow period (winter and spring in this watershed) to maintain a minimum flow of five plus cfs, according to my calculations. The MNVC water study forecasts a water need for this area of 1065 gallons per minute. This is equal to approximately 2.4 cfs. The Jumpoff Joe small reservoir project would be able to provide the MNVC with about 5 cfs, year round.

If OWRD is serious about providing water for our future needs, I hope they'll look into this.

Thanks,

Malcolm Drake
Grants Pass, Oregon
541 476 6166

Benton-Lane-Linn Water Resources Study Group
November 2, 2009 (email)

RE: Draft Comments on Integrated Water Resources Strategy and Issue Papers

As County governments, understanding the societal, scientific, and political water issues across political boundaries is vital for ensuring a high quality water supply for the many uses, needs, and users of water. Since June 2009 Benton, Lane, and Linn County Commissioners and other participants including the Oregon Water Resources Department staff, have met to discuss regional water issues. The Study Group Purpose Statement is as follows:

To ensure a reliable supply of clean water for all users and beneficial uses and inform the decision-makers in Benton-Lane-Linn Counties, the Benton-Lane-Linn County Water Resources Study Group will: 1) comprehensively examine shared water resources quantity, use and quality issues; and 2) work collaboratively, transparently, and efficiently to address shared water issues.

County Commissioners will lead the study group effort, partners in academia, governments, and many other stakeholders will be called upon as work plan objectives are undertaken and financial support is secured. Working to address water issues, Benton, Lane, and Linn Counties and participants that join these convening counties' efforts, will provide the strength to understand and plan for the region's water quality and quantity across many jurisdictional boundaries and authorities.

The Benton-Lane-Linn Water Resources Study Group has agreed to comment collectively on the Draft Oregon Statewide Water Strategy documents (draft work plan, draft issue papers) that have been formed to meet the goals of HB 3369. These comments are attached for Commission review and adoption.

All comments were vetted by the current group members (conveners). Study Group members will include more participants as a Joint Resolution and Memoranda of Cooperation are signed and a draft work plan is finalized.

Study Group conveners and participants are interested in hosting workshop(s) to share the State's strategy work with stakeholder groups and residents in the three county area. Please work with Adam Stebbins, Benton County Water Projects Coordinator (adam.stebbins@co.benton.or.us; 541-766-6085) regarding OWRD strategy collaboration.

Sincerely,

- Benton-Lane-Linn Water Resources Study Group current members

Comments on Preliminary 2009-2012 Work Plan: Oregon's Integrated Water Resources Strategy:

1. **Define and/or support with examples** of what 'healthy', 'clean', 'adequate', 'need', 'demand', 'reliable' and other terms specifically mean; within all strategy documents (including 1-page briefing note).
    a. There has already been definitions outlined for statewide and integrated; working definitions for the above terms and others where appropriate would be helpful.

2. **Pg.2 Paragraph 2 and bulleted list of strategy objectives**: Focus on this 'first round' of strategy development should 'focus on building a state-wide set of tools'—this work should not unnecessarily be new, but built on existing datasets and tools that integrate water quantity, quality environmental and economics
    a. Examples include: Willamette Basin Collaborative Modeling(Sandia Natl Laboratories, USACE, David Evans & Associates), USACE WATER team modeling, and local integrated scenarios as part of the OWSCI community work (e.g. Benton County Water Project 2007-2008, EWEB)

3. **Pg. 2 Intention**: Consider adding wording that the 'intention to develop framework, data, tools and resources that communities can use, to address their water resources needs', will be based on the existing sound local, state and federal technical information, whenever possible.

4. **Pg. 3 Information Flow Chart**: Where will counties and other local government provide direct input to the developing strategy? This is not clear within the stakeholder schematic or written description.

5. **Pg. 4 Stakeholder Advisory Groups**: Will there be a Stakeholder Advisory Group process?

6. **Pg. 5 1.3 Public Participation Process**: Holding water workshops similar to the 2008 Oregon Water Roundtables (http://water.oregonstate.edu/roundtables/index.htm) would be effective in gaining water resources professionals—not the public directly; heightened PR could gain sufficient 'public' attendance. Working with local stakeholder groups (counties, cities, councils, districts) will create a greater local turnout at public 'town hall' meetings that are being planned for.

7. **Pg 5 1.4** specific names of OWRD staff filling positions to help develop the Strategy should be made publicly available for

8. **Pg. 6 Phase II:** Water workshops should involve diverse groups of stakeholders in brainstorming sessions. Input from County decision makers and staff (planners, development, etc.) should be collected to help shape Oregon's future water needs and resources.

9. **Pg. 6 'Requirements as per HB 3369 (2009)'**: Plans related to the challenges presented by climate change—this work should be informed by scenarios that include population change and land use change.

10. **Pg. 6 'Optional as per HB 3369 (2009)'**: Assessment of Basin Yield should occur. This work has been a leading priority of the State, and is necessary for planning going forward. For example, the Willamette Basin supply of water is heavily regulated by the Federal Storage projects and needs to be accounted for.

11. **Pg. 6 Examples of 'communities successfully using any water resource tools'**: The Upper Willamette Basin (Benton, Lane, Linn County Water Resources Study Group) should be actively working with the State to demonstrate the successful use of the water resources described, and other available tools (OWSCI Water Demand Forecasting, OWRD Water Availability Analysis, Water Rights Data, Water Quality Data, and other modeling data).

12. **Posting** of all project team meetings should occur with all supporting materials for public review.

<u>Comments on Oregon Integrated Water Resources Strategy Issue Papers (Paper 1):</u>

1. **Contents**: There are no 'potential consequence of neglecting water quality in planning' or 'benefits of integrating water quality and water quantity planning' or 'key challenges…' for Sections 4,5 with Section 7 lacking the benefits section only. Will this be provided for consistency in the future?

2. When will the Ecology section of the issue paper be completed?

3. **Pg. 6, second paragraph**: the concept of water scarcity should be backed up with select examples (e.g. multi-jurisdiction basin water issues/governance in the U.S.).

4. **Pg. 9, Surface water:** the paragraph should acknowledge the large volume of storage and regulation within the Upper Willamette Basin region. Noting that storage in the Willamette Basin is not to be allocated for municipal or industrial uses (however this is occurring e.g. City Monroe; OWRD has authorized surface water from federal storage in Fern Ridge Reservoir contingent upon the City of Monroe gaining a storage contract with US Army Corps if/when these are made available).

5. **Pg. 13, Water Resources Department identified '*aquifer of concern*'**: The department should acknowledge that all basalts (e.g. Siletz River Basalt) in addition to the sediment/sandstone have water supply and water quality issues throughout the Willamette Valley region; exactly where rural development occurs.

6. **Pg. 13 Conclusions, second paragraph**: What is meant by completed groundwater investigations? Additionally, 'climate change analysis' should be based on existing studies (e.g. University of Oregon, Doppelt study) and fill in gaps, expand, etc. where possible.

7. **Pg. 15 Background**: define 'clean water'.

8. **Pg. 16, first paragraph**: add 'local jurisdictions (counties and cities)' as having responsibility for water quality protection through comprehensive planning, storm water management, and other regulatory water quality requirements from the State.

9. **Pg. 16, third paragraph**: 'land use management, with all its implications for water resources, is a function that resides with local planners'—add also with 'local planning commissions, commission boards and councils, and the public process'.

10. **Pg. 17 final sentence**: list examples of what DEQ if currently working on for future TMDL listings and standards.

11. **Pg. 19 first paragraph**: Listing the pharmaceutical collection pilot projects occurring throughout the state would be beneficial. This is a statewide health and safety issue of concern.

12. **Pg. 20 bullet #1**: the posed question of 'a real or perceived problem of coordination with State land use planning goals/procedures' is a valid point that local government struggles with. Statewide planning goals, applicable to water quantity and quality are met by local government in a variety of ways that affect water resources and improved guidance could be beneficial.

13. **Pg. 23 first paragraph**: food processing water demands; examples would be useful from across the State.

14. **Pg. 24 fourth paragraph, first sentence**: note that the development department official made this comment at the Association of Oregon Counties, Water Summit meeting in Corvallis, August 2009.

15. **Pg. 28 third paragraph, second sentence**: land use planning Goal 6: Air, Water and Land Quality and Goal 7: Hazards have also been utilized by local government for water resources planning and policy.

16. **Pg. 28 bottom of page, third bullet**: OWRD already completed a survey of conservation programs, resources and incentives—this should be built upon.

Douglas County Public Works
Tom Manton
September 25, 2009 (email)

I believe it is important for the project team to be aware of Douglas County's rich history and leadership in water resources management in the Umpqua Basin.

An excerpt from Volume I - Findings and Implementation of the 2008 update to the County's Water Resources Program is presented below.

Here's an online link to the 2008 update to the Water resources Program:
http://www.co.douglas.or.us/planning/WaterRescProgram.asp

Thank you,

Tom Manton
Natural Resources Division Manager
Douglas County Public Works Department
1036 S.E. Douglas, Room 306
Roseburg, Oregon 97470
(541) 440-4255
Fax (541) 440-6264
trmanton@co.douglas.or.us

1.A. Program Goal and Objectives

Douglas County has made substantial progress in addressing water resources issues throughout the Umpqua Basin. These accomplishments are described in Section 1.B. These efforts reflect the following overall water management program goal:

- **Provide year-round, high quality surface water supplies sufficient to meet current and future needs for all beneficial uses in Douglas County.**

Beneficial uses have been designated by the State and are outlined in the Oregon Administrative Rules (OAR 340-041-0320) on all streams and lakes in the Umpqua Basin. Although beneficial uses vary somewhat by river or stream, they include the following:

- Domestic water supply
- Fishing
- Industrial water supply
- Irrigation
- Water contact recreation
- Livestock watering
- Aesthetic quality
- Fish and aquatic life
- Hydropower
- Wildlife and hunting
- Commercial navigation and transportation

The program goal is more specifically stated in the following program objectives:

1. Achieve water quantity and quality conditions in all streams and lakes to protect the relevant beneficial uses listed above (from OAR 340-041-0320).
2. Insure available municipal and/or industrial water supplies to fully meet existing needs and to support further population growth and industrial diversification.
3. Insure available irrigation water supplies to fully meet current shortages and to provide for further agricultural intensification and diversification.

1.B. History of Water Resources Management

1.B.1. Douglas County

Douglas County has become increasingly active in water resources management since it established the Water Resources Survey in 1956. The primary focus of the Survey at its inception was collection of hydrologic data. In the last fifty years, the County program of water resources management has evolved into one of the most active in Oregon and is among the leading county programs in the nation. The Water Resources Survey was renamed the Natural Resources Division (NRD) in 1996.

The NRD's water resources responsibilities have expanded to include the operation of Ben Irving and Galesville reservoirs, and planning of additional storage facilities. The NRD partners with the United States Geological Survey, United States Forest Service, Oregon Department of Fish and Wildlife, Oregon Department of Environmental Quality, Oregon Water Resources Department, Bureau of Land Management, and other agencies in various water-related projects.

In 1956, the County developed the Water Resources Advisory Committee, referred to today as the Water Resources Advisory Board. The current board is composed of nine members that include local citizens from throughout the County familiar with water issues that provide guidance and input to County officials on water issues and needs specific to different regions of the County.

In 1992, the Umpqua Basin Fisheries Restoration Initiative was developed as a subcommittee to the Water Resources Advisory Board. The initial focus of the group was to complete 2,000 miles of aquatic habitat surveys on basin streams. The group was later changed to become an official watershed council and an advisory group to the Douglas County commissioners in 1997. The name was then changed to the Umpqua Basin Watershed Council (UBWC).

The official connection of the watershed council as a subcommittee to the Water Resources Advisory Board was terminated in 2000 when the council was registered as an Oregon non-profit organization. The UBWC received provisional 501(c)(3) status the following year and a final status ruling in 2006. The council changed its name in 2005 and is now known as the Partnership for the Umpqua Rivers. The council now serves as a non-profit watershed council for most of the Umpqua River basin. There are also two other watershed councils operating in the basin, Smith River and Elk Creek watershed councils. The primary focus of the watershed councils is to improve water quality and fish habitat in the basin streams.

In the western region of the country, major water resources projects have been constructed by federal agencies such as the U.S. Bureau of Reclamation and U.S. Army Corps of Engineers in response to local requests to alleviate the kinds of issues identified in Volume II. These agencies have prepared or contracted studies of potential storage projects in the Umpqua Basin since the early 1950's.

Construction of the Galesville Reservoir is the only County project to date that has received federal funding. The Galesville project was partially funded by the U.S. Bureau of Reclamation's Small Reclamation Projects Program. Although other projects have been identified that met the economic and environmental criteria of the program, no other major federal storage projects have received federal funding in Douglas County.

The County, in recognition of issues and limitations related to water use, first prepared their Water Resources Management Program in 1979. The program was later updated in a 1989 revision. This 2008 revision is the first update authorized by the County since 1989.

In 1979 the County completed the Berry Creek Project. This $7.5 million (1978 dollars) earth-fill dam serves in-lieu of the United States Bureau of Reclamation's proposed Olalla Project, one of the authorized but not constructed projects in the County. The impoundment, Ben Irving Reservoir, has the storage capacity of 11,250 acre-feet for irrigation, municipal, streamflow augmentation and reservoir recreation purposes. The project was constructed entirely with County funds on a "pay-as-you-go" basis.

A second storage project, jointly sponsored by Douglas County and the City of Canyonville, was completed in 1981. Win Walker Reservoir is a 300 acre-foot impoundment that provides essential storage for the City's water supply. Construction of the $2.8 million project (1980 dollars) was funded by the City of Canyonville, the County, and a Farmers Home Administration grant.
In 1982, after detailed engineering and environmental studies of four alternative sites, construction began on the 41,870 acre-foot Galesville Project located on Cow Creek near Azalea. Prior to construction, Douglas County citizens passed a ballot measure by over 75 percent approving construction of the project. The project was completed in 1986. Primary project benefits include flood control, irrigation, municipal and industrial water supply, and anadromous fish enhancement. Hydroelectric power is a secondary use that is generated as releases are made for the primary benefits listed above.

Total project costs were $36 million in 1986 dollars. The project was funded in part, by the Small Reclamation Projects Program (PL 84-984) administered by the U.S. Bureau of Reclamation. About $15 million in grant funds for flood control, anadromous fish, and recreation costs of the project were received. The County expended about $10 million during the construction period. The remaining project costs of about $11 million were to be repaid as a loan over a 40-year term. In early 1988, the U.S. Bureau of Reclamation offered to discount the loan for a payment of about $7 million. The County accepted the offer and no further financial obligations exist.

In 1985 the County funded engineering costs for a 100 acre-foot reservoir for the City of Yoncalla. The completed structure is considered an interim measure until a more reliable water supply becomes available.

Douglas County has spent approximately $12 million between 1997 and 2008 on pre-construction work for the Milltown Hill Project located in the Northern portion of the County. The project was shelved in 1997 when cutthroat trout were listed as threatened on the endangered species list, and the State would not grant a fish passage waiver. A subsequent waiver was allowed with the requirement of substantial fish habitat mitigation work that proved too costly for the County to endure.

Cutthroat trout were later de-listed in 2000, and the County began an update of environmental reports in 2005 in the hope of securing construction funding. The most recent cost estimate update was prepared in 2006, which presented the cost of the project at $80 million (2006 dollars). Fish passage and mitigation, and water quality have been major issues in the approval of this project. The County suspended the environmental update work in 2008 due to the escalating costs and lack of funding sources.1

Douglas County Commissioners inaugurated the Stream Habitat Improvement Program (SHIP) by ordinance in September, 1984. This program provides financial assistance to eligible applicants for projects that will increase anadromous fish populations; preserve, enhance, or restore aquatic and riparian habitat; and/or provide educational activities pertaining to fisheries. These projects make a significant contribution to the stream improvement program under the direction of the NRD.

Annual funding levels for the SHIP program are approved by the Board of Commissioners. The program is administered by a five-member Salmon Habitat Advisory Committee, with the advice of representatives from the Oregon Department of Fish & Wildlife (ODFW), Oregon Department of Forestry, U.S. Forest Service, and Bureau of Land Management. The committee is authorized to develop intergovernmental agreements as necessary for implementation of appropriate projects, and to develop priorities.

Applications for projects are reviewed by the NRD and ODFW staff. Action recommendations are made to the advisory committee with regard to specific applications. Project costs are shared by landowners, the County, and other entities.

In 1993, a Southern Pacific freight train derailed near Yoncalla. In 1995, the Yoncalla Creek Diesel Spill fund was established as mitigation for the associated spill. The fund is administered by the SHIP Committee. Since the creation of the SHIP program in 1984, at least 45 projects have been completed with approximately $422,339 invested between both the SHIP and Yoncalla Diesel Spill funds. There is currently $8,999 in the SHIP fund and $269,538 (as of September 2007) in the Yoncalla Diesel Spill fund.

Eugene Water and Electric Board
Brad Taylor
September 25, 2009 (email)

In the Key Challenges, Research, and Technical Questions section of the Water Quantity Issue Paper I would recommend that in the last bullet you put something around exploring existing storage use as a potential source. This is an Oregon issue, not just Willamette Basin issue that has a big impact on the overall picture.

You all have done a lot of great work on these documents…..keep up the great work.

Brad

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LEAGUE of Oregon CITIES
P.O. Box 928 • Salem, Oregon 97308
(503) 588-6550 • (800) 452-0338 • Fax: (503) 399-4863
www.orcities.org

October 29, 2009

Water Resources Commission
725 Summer Street NE, Suite A
Salem, OR 97301-1271
waterstrategy@wrd.state.or.us

RE: Oregon's Integrated Water Resources Strategy Draft Preliminary 2009-2012 Work Plan and Draft Issue Papers

Members of the Water Resources Commission:

The League of Oregon Cities is an association of all 242 cities in Oregon. Oregon's cities are strong stewards of public water supplies and many provide clean water for drinking, industrial, public safety, recreational, and irrigation purposes, as well as manage stormwater and wastewater. Oregon's cities are also where 70% of the state's population lives, a share projected to increase to 76% by 2020. We applaud the work to date done by the Commission, Director Ward and Oregon Water Resources Department staff on development of an integrated water resources strategy for the state and appreciate the opportunity to comment on the draft preliminary work plan and draft issue papers.

We would also like to express our appreciation to Dr. Brenda Bateman and Alyssa Mucken for thoughtfully briefing and soliciting input from the League of Oregon Cities Water/Wastewater Committee, which is comprised of elected officials and professional staff from diverse cities around the state. Due to time constraints the group was only able to complete the "threats" and "weaknesses" components of a SWOT (Strengths, Weaknesses, Opportunities, and Threats) analysis. Committee members certainly also see a range of strengths and opportunities that should be considered in developing an integrated water resources strategy. The League would be happy to facilitate additional opportunities for cities to inform the strategy development process moving forward.

Considering the projected impacts of factors such as population growth and climate change, it is clear that Oregon should learn from other western states in developing a water strategy. Moreover, the multitude of demands for water use, supply constraints, and quality limitations will all challenge water management in Oregon and demand an integrated approach. As such, the League of Oregon Cities is committed to supporting the development of the integrated water resources strategy and hope that our

contributions to this tremendous work will help produce the best possible outcome for the state.

General Comments:

The draft issue papers provide an important review of water data, management, current and projected demand, and benefits to the state that will serve as a foundation for developing an integrated water resources strategy. We hope that our comments help to improve and refine the issue papers and preliminary work plan.

A strength of the issue papers is the summary of key data and data limitations, as well as current management practices. Some statements, however, lack supporting data or are based on inherently subjective views, and we have tried offer caution in our specific comments where that is the case.

In reviewing the discussion of data availability, water supply and quality conditions, and water use, it is evident that conditions vary by basin. We recommend developing a basin-by-basin matrix of data availability, results, and deficiencies (e.g. basin yield analyses, groundwater supply designated areas, groundwater quality designated areas, water use by sector, allocation during different seasons, etc.). This would anticipate that the integrated water resources strategy will be a statewide framework more detailed planning, management and investment activities at the basin level. If possible, this basin-specific accounting should be included as an appendix to the issue papers to organize and complement the information included in the narrative and as maps.

Likewise, throughout the issue papers we suggest rephrasing "Key Challenges, Research, and Technical Questions" as "Key Technical and Policy Questions and Opportunities". Research, pilots, and investments will stem from these key questions and opportunities as necessary.

We respectfully urge a more detailed discussion of the role of municipal water use and municipal water suppliers in Oregon in terms of planning, management, and benefits. In that regard, our section-specific comments offer a number of suggestions regarding municipal water use and suppliers. Though municipal water use accounts for a small percentage of the out-of-stream water use in the state, it has a disproportionately large impact on public health, public safety and Oregon's economy. Moreover, municipal water, stormwater and wastewater utilities have a duty to serve the public and must plan to meet demands in coming decades. They also do so while typically facing more stringent regulatory scrutiny than other water stakeholders. Plans that municipal water, stormwater, and wastewater utilities may need to complete include:

- Drinking Water Facilities Plan
- Water Management and Conservation Plan
- Water System Emergency Response Plan
- Wastewater Utility Master Plan
- Biosolids Management Plan

- Stormwater Management Plan
- Salmon (Endangered Species Act) Response Plan
- TMDL Implementation Plan

The League has made municipal water use data inquiries in coordination with the Special Districts Association of Oregon to the Oregon Business Development Department (OBDD) and the Department of Human Services Public Health Division Drinking Water Program. We recommend that the project team work closely with both of these agencies in this regard. Oregon lacks a comprehensive source of data on the role of water in our state's economy, but OBDD can contribute to a better understanding of the water use and suppliers of water to major manufacturing sectors in the state, as well as water-related infrastructure needs.

The Drinking Water Program can provide information regarding the number and size of public water systems, as well as the number of Oregonians who get their drinking water from public water systems. As briefly noted in the Water Quality issue paper, the Drinking Water Program is responsible for domestic drinking water quality for all citizens of the state through its implementation of the federal Safe Drinking Water Act. The importance of this function should not be underestimated and also merits more discussion in the issue papers. Considering such unique and critical expertise, the League urges the inclusion of a Drinking Water Program representative on the integrated water resources strategy project team.

We also recommend greater integration of the issue papers and preliminary work plan with the current development of an agency-wide toxics reduction strategy at the Department of Environmental Quality. Certain water pollutants come from air and land deposition, and reduction of toxins in our water will demand an integrated strategy that effectively addresses water, air, and land pollution, as well as both point and non-point sources.

Comments on "Introduction: the Need for an Integrated Water Resources Strategy":

Page 5, first paragraph:

> In addition to an integrated strategy providing "relevant and consistent guidance to each of the basins," it should provide incentives for integrated water management strategies, planning, and implementation. This could also be incorporated in the bulleted list on page 6 (see below).
>
> Also, we suggest considering use of phrases such as "An integrated strategy *will* provide..." rather than "An integrated strategy *should* provide…" to reflect the authority for this effort.

Pages 5-6, "A Limited Supply of Clean and Abundant Water": In referencing water quality degradation as potential contributing cause of water scarcity, this section should

also reference developments in water purification technology as a potential way to alleviate water scarcity.

Page 6, last paragraph of “A Limited Supply of Clean and Abundant Water”: This last sentence is ambiguous.

Page 6, “The Value of a Strategy”:

> The narrative of this section implies that the value and purpose of an integrated water strategy is limited to economic and ecological considerations. The language should be amended to also explicitly acknowledge public health (i.e. safe drinking water) and public safety (i.e. fire suppression) as key considerations.
>
> A strategy can also be valuable in directing infrastructure and program investments to focus on areas of greatest need and effectiveness. Another value of a strategy can be identification of opportunities to mitigate risk before emergencies occur—helping to avoid future water shortages or supply disruptions.
>
> The statement in the second bullet about balancing competing use of water through “efficient allocation” appears to conflict with the statement in the Preliminary Work Plan that “Nor is the intention [of developing an integrated water resources strategy] to lay out a plan that re-allocates water.”
>
> Bulleted list: Add a bullet “Provides a framework for local water stakeholders to facilitate and complete integrated water management planning.

Page 7, "Building a Foundation of Data": This section should also mention that municipal water suppliers maintain accurate water use data and water demand forecasts.

Comments on “Water Quantity”:

Page 8, “Background Information”: A detailed accounting of basins and areas with groundwater limitations should be included in this issue paper or as part of an appendix. (See comment regarding page 12 below and general comment above.)

Page 8, third paragraph:

> The discussion of increased demand projections by sector is incomplete should be accompanied by information on current use by sector.
>
> The last sentence is a broad statement that should be accompanied by supporting data.

Pages 9-11: The maps in this issue paper should include, or make note of the need to develop, a table outlining water availability by basin and season. (See general comment about an appendix above.)

Page 12: A detailed accounting of basins and areas with groundwater limitations should be included in this issue paper or as part of an appendix. (See comment regarding page 8 above and general comment above.)

Page 13, Key Challenges, Research, and Technical Questions": We request that "storage" be added to the last bullet.

Page 13, "Challenges and Next Steps":

> The last sentence of the first paragraph seems to unnecessarily pit water storage against ecological flows and peak flows. We suggest that this sentence state the need to develop opportunities to store winter water where feasible.
>
> The discussion of next steps should also include promotion of aquifer recharge and aquifer storage and recharge to restore declining regional groundwater levels where applicable.

We suggest that the Water Quality and Water Quantity papers make reference to the influence of stormwater management on both water quality and quantity. Stormwater routed to swales, wetlands, rain gardens, or other slow percolating technologies provides both groundwater recharge and delayed movement down gradient to water courses as well as natural treatment of the stormwater.

Comments on "Water Quality":

Page 15-16: The "Institutional Structures" should include discussion of the role of municipal water suppliers and treatment agencies. Municipal suppliers require ambient water to maintain and retain the highest quality level possible in order to provide domestic supplies that contribute to the health and safety of its customers. Municipal water providers also experience a greater degree of regulatory scrutiny in both the withdrawal of water and discharge of wastewater than water users who utilize more of the supply. In addition non-point sources have less regulatory burden that do point sources of discharge yet in many instances have greater impacts to the quality of the waters of the state.

Page 17: The "Setting Water Quality Standards" section should include discussion of the Safe Drinking Water Act.

Pages 29-20, "Key Challenges, Research, and Technical Questions":

> We suggest adding a bullet in reference to the statement about DEQ's lack of resources to continue to conduct a statewide groundwater assessment and monitoring program. Failure to adequately monitor groundwater for potential contamination creates the potential for long term damage to groundwater dependent water users, including municipal water suppliers who must provide safe drinking water.

The bullet on "resilience" should note that it may also be impacted by volcanic and earthquake activity, as well as human impacts such as floodplain encroachment.

Comments on "Economy":

The references in this paper to the areas of the state each type of water use is most important would benefit from detailed basin-by-basin information on water use by sector, as well as projected changes in demand by sector. This information is fundamental to development of a strategy, however, and may be better integrated into the Introduction or Water Quantity papers. (See comment above regarding page 8, third paragraph.)

Pages 22-23: As currently written, the paper implies that food processors are part of the agricultural use of water. It would be helpful to state how many of these facilities rely on municipal water supplies.

Pages 23-24:

We suggest combining "Water and Municipal Use" and "Water and Manufacturing" into a single section. As currently written the sections discount the role of municipal suppliers in delivering water to manufacturers. Moreover, though some industries hold independent water rights, in some instances those industries may discharge to municipal wastewater treatment systems.

We urge more discussion of the linkage between municipal water use and Oregon's economy. In addition to delivering potable drinking water and the aforementioned water for manufacturing use, municipal water suppliers deliver water for commercial purposes, fire suppression, irrigation, and recreation. All of these factors contribute to economic activity in Oregon cities, whose residents generate more than 80% of the state's income tax revenues. It would also be appropriate to note that urban economic activity is a highly efficient use of water considering the statewide percentage of water used for municipal purposes.

The last paragraph of the "Water and Manufacturing Section" appears based on the knowledge of a single individual. We suggest replacing this paragraph with information on the kinds of industries that do consider certainty, quality, and price of water supplies in making location decisions. The Oregon Business Development Department, businesses themselves, and the water utilities that serve them should all be able to contribute information in this regard.

We also suggest considering including brief discussion of the impact of inadequate supplies of clean water on economies in other parts of the world.

Lastly, the paper could reference the role of water in shipping goods, and the effect of flows and sedimentation in maintaining adequate depths (e.g. greater costs of more frequent dredging).

Comments on "Social Issues":

We recommend reconsidering the social issues paper in the context of the charge for developing an integrated water resources strategy. Attempting to summarize or openly pose philosophical questions and other inherently qualitative aspects of social issues related to management of Oregon's water resources is inherently difficult and erodes clarity from the stated intent for a strategy in the preliminary work plan. We suggest striking these portions of the paper and folding the other elements of this paper such as governance (land use planning, emergency powers, etc.) into other issue papers. If this paper is retained, however, we would suggest an alternative focus on recreational and public health aspects of water management in Oregon.

Comments on "The Implications of Climate Change":

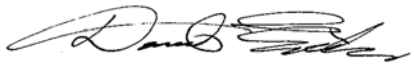
We recommend expanding the focus of this paper to include "The Implications of Population and Climate Change." Population growth, like climate change, (with acknowledgement of differing projections for various communities and regions) is a major trend impacting development an integrated water resources strategy. This may also be an appropriate place to discuss land use scenarios associated with population change, and the water use associated with various types of land use (e.g. residential development, irrigated agriculture, etc.)

In the section discussing the potential consequences of neglecting climate change, the narrative should better discuss the varying levels of reliance of basins around the state on snowpack (as opposed to rainfall), as well as projected regional changes in precipitation patterns (timing, snowpack versus rainfall) and amounts.

Comments on Advisory Groups:

The League of Oregon Cities would like to reiterate our support for development of the integrated water resources strategy. We would like to assist with outreach, technical assistance, and identification of individuals to serve on the Policy Advisory Group and Technical Advisory Group. We also suggest the formation of a stakeholder advisory group to ensure ongoing dialogue between the project team and various stakeholder organizations, and would gladly serve on such a committee. Thank you for your consideration.

Sincerely,



Daniel Eisenbeis
Intergovernmental Relations Associate

Cc: Dr. Brenda Bateman
Representative Ben Cannon

Mr. Michael Carrier
Senator Jackie Dingfelder
Environmental Quality Commission
Mr. Ray Jaindl
Representative Bob Jenson
Mr. Bruce McIntosh
Ms. Alyssa Mucken
Director Dick Peterson
Director Gail Shibley
Representative Jefferson Smith
Ms. Christine Svetkovich
Director Phil Ward

League of Women Voters of Oregon
September 9, 2009 (email)

Per your instructions, below are preliminary comments related to the draft issue papers made available through the Commission's agenda/reports website. They are perhaps best used internally until the League can have additional time to review the Commission's work in greater detail. However, we felt it was important to acknowledge the work done and provide some immediate feedback. Again, thank you for your dedication to this project:

Sept. 10, 2009 Draft, Introduction, A Limited Supply of Clean and Abundant Water: GroundWater Management Areas (GWMAs) are mentioned later in the paper. Are there other DEQ designations or ODFW designations that should be mentioned?

Building on a Foundation of Data, Page 7: Again, data mentioned is only WRD data. How to coordinate w/DEQ and others?

Water Quantity, Background Information, Page 8: the 2008 water demand forecast simply used current data and extrapolated. The new strategy needs to take such data and calculate how conservation, government collaboration and other methods could reduce that demand to something more economically reasonable to meet.

The streamflow maps on page 10 and 11 (Figures 1 and 2) will need to be recalculated after putting in climate change and population demands in order to reflect the future. The same may be true for Figure 1 on page 17 since increased temperatures may well change the look of Oregon's Impaired Waters.

Figure 3, page 12, will need a land use zone designation overlay to help better understand future potential demand for groundwater. Policies related to exempt wells must be considered as well.

Page 16, land-use management: Calls out for participation from AOC and LOC Planners Groups as well as their Policy Boards.

Page 13, Key Challenges, Research, and Technical Questions: The list relates to WRD, but does not include the other agencies who deal in water quality and other water responsibilities.

Page 26, Social Issues. It seems appropriate that the Commission seek advice from the Environmental Justice Commission. Searching the Big Look Task Force lists of groups interviewed or who participated might also be helpful in broadening your outreach efforts beyond "the usual suspects".

Page 30: climate change research: Rogue Basin Study done in 2008: The study comes from the University of Oregon's Climate Leadership Initiative and the National Center for Conservation Science and Policy in Ashland. I believe that the Willamette Basin study is in process now.

Page 33, forests: no mention of headwaters and importance of natural storage of water in forests, such as how climate change will affect Bull Run and other municipal watersheds.

General comment: there seemed to be very little said in the papers about the overlapping mandatory federal regulations such as the Clean Water Act with TMDLs and the ESA as well as

drinking water requirements. We know the Commission realizes this disconnect, but the League wants to reinforce our concern about this gap. [1]

Peggy Lynch, LWVOR Natural Resources Coordinator

Sent by:
Rebecca Smith
Executive Administrator
League of Women Voters of Oregon and
League of Women Voters of Oregon Education Fund

[1] This comment was received via email, 11/4/2009, as an addendum to the 9/9/2009 email.

Oregon Department of Agriculture
October 15, 2009 (email)

Comments on IWRS issue papers:

ODA appreciates the opportunity to comment on the issue papers. An integrated perspective on water is critical, and agriculture has a major interest. The following comments, suggestions, and recommendations are made in the spirit of improving the issue papers and contributing to the reader's understanding of these critical concepts.

I. Introduction section.
Pg. 5. "A Limited Supply…" section.
The draft states: "The water cycle is scientifically accepted and verifies that no additional or 'new' water can be found or produced."

The corollary or this is also true: The total volume of water in the world cannot be reduced in the same way that coal, oil, or natural gas is depleted. Water will change form, location, or condition, but the volume is still the same. Without addressing water quality here, technology can improve or make water usable in ways not previously accessible.

We recommend that the sentence be modified to be more neutral in its statement, rather than compared to items to those that can be depleted totally, and which are generally associated with pollution and climate change.

Pg 6.
The draft reads: "Freshwater bodies have limited capacity to process the pollutant load from expanding urban, industrial, and agricultural uses."

Is there evidence that pollutant loads are a result of "expanding agricultural uses?" By most accounts, agricultural land/acreage is shrinking from the pressure of urban, residential, and industrial uses. Agricultural use of chemicals and fertilizers is also more focused, applied with greater precision, and being tempered with more use of Integrated Pest Management (IPM) techniques, softer chemicals, and more organic production.

II. Water Quantity
Pg. 8.
In addition to % demand increases noted from the Statewide Water Needs Assessment, including the volume of each use would add to the discussion. For example, it would helpful to see how a 55% increase in municipal demand compares to a 57% increase in domestic demand, and a 10% increase in agricultural use. Since population increase is one of the primary driving forces behind demand for food and agricultural production demand (hence, irrigation needs), the correlation between these would be helpful to note.

Further, the rational behind a static industrial demand would be helpful to include…hard to see how the state can grow industry with no increase in demand for water.

Additionally, there is no discussion in this section about how water rights in agriculture are associated with land ownership. This is a key relationship that readers should be acquainted with.

Finally, it would be helpful to add some explanation of the reservoir system in Oregon, the water supplies it contributes, how storage plays a key role for summer time availability of water for all uses, who the players are in this arena (Corps of Engineers, US Bureau of Reclamation, BPA, etc.), and what water reservations are still possible through the storage system.

Pg. 13.
Given the obvious availability of water during January versus summer months, more emphasis is needed to "expand the pie" of water, rather than continuing to slice it smaller and smaller and fight over the slivers. The final "bullet" in the "Key Challenges, Research, and Technical Questions" section is the only reference to "possibilities for other sources of available water." This is precious little attention to increasing water supply in a series of issue papers for a statewide strategic water plan.

The existing and leading-edge technologies for increasing water supply should be included or referenced in greater detail, along with the challenges, opportunities, and strategies for development of these possibilities.

This topic deserves more than passing mention and a single bullet in this series of papers. This is THE key ingredient in helping to balance all other areas. Without expanded water capture during winter months, and/or de-salinization, water re-use, etc., other strategies in this effort will not have the capacity to address growing needs and competition for a shrinking supply.

<u>III. Water Quality.</u>
Pg. 15.
Draft reads: "The ability to comply with water quality standards is further *hampered* by increasingly sensitive technology that can detect pollutant as low levels—and the increasingly stringent water quality standards designed to protect against these pollutants."

Suggested language change: "The ability to comply with water quality standards is further <u>complicated</u> by increasingly sensitive technology…"

Draft reads: "While states have the ability to develop water quality, they can only be as strict or more strict than Federal Standards."

Suggested language change: "While state have the authority to establish water quality standards, these standards must be as strict, or more so, than the Federal Standards.

Pg.16, last paragraph.
Draft reads: "Here, DEQ would set bacteria standards to meet human health standards; it would set *toxics* for both human health and aquatic life, and set dissolved oxygen…"

Suggested language change: "Here, DEQ would set bacteria standards to meet human health standards; it would set <u>toxic limits</u> for both human health and aquatic life, and set dissolved oxygen…"

General: There is no discussion of stream temperature as a key issue in water quality to the extent it is the primary factor in a larger percentage of TMDL limits. This is one of the biggest challenges to rural areas and agriculture throughout the state. Worth some description and discussion.

Pg. 18 "The Potential Consequences…"
First bullet: very vague – what was the cause or type of water quality problem? Was it a temporary situation or longer-term concern?

Most of the bullets are vague and general and don't provide the reader with much clarification of a problem or how it will impact water quality.

Most examples under the title "The Benefits of Integrating Water Quality and Water Quantity Planning" would be very helpful to illustrate the link. Key to this discussion, again, is the statement: "…water that was previously viewed as a liability…" could be used in new ways through technology or different strategic approaches or delivery systems…."treat effluent, gray water, storm water re-use… etc.

"Key Challenges, Research, and Technical Questions"
"Natural Conditions" bullet. In addition to asking what is 'natural,' and could or should we return water bodies to a 'natural condition,' these questions should also be included: "Is it possible to return a water body to its natural condition? At what cost? Who pays for it? What are the cost-benefits? How do such projects compare in priority to other water needs, and under what criteria?

Final bullet. Missing word: "Who should <u>pay</u> for clean water?"

<u>V. Economy.</u>
Water and Agriculture.
Pg. 22 Draft reads: "…irrigated agriculture uses more than 85 of the water that is diverted in Oregon."

Need to add "percent" after 85. Would also recommend a statement such as:
"Agriculture uses water to transform plants and soil and sunlight into food, products, and fabrics that humans need for survival and everyday use."

There is a sense by some that agricultural use of water is wasted, excessive, unnecessary, and/or unneeded. This ignores the fact that more than 50% of all vegetable production in the US, and a high percentage of fruits require supplemental irrigation. Food is not manufactured in a grocery story. Water is as essential for food and other agriculture products as it is for human consumption directly.

The need to irrigate is usually driven by the necessity to meet the water needs of the crop from year to year (many areas of the state and the US simply receive too little rainfall during the growing season to support economical crop growth). In other situations, irrigation is viewed as insurance against occasional drought.

Other benefits include:

- Improving crop quality (most noticeable for vegetable crops)
- Significantly increasing crop yields, particularly on sandy soils which have low moisture-holding capacities
- Increasing opportunities for double cropping (planting soybeans after wheat in the same year)
- Providing a means of liquid fertilizer application

In 1997 there were about 55 million irrigated crop acres in the U.S.

http://www.epa.gov/agriculture/ag101/printcrop.html#irrigation

Several studies indicate that residential and commercial lawns (sports fields, golf courses, etc.) are the largest irrigated "crop" in the US.
http://earthobservatory.nasa.gov/IOTD/view.php?id=6019

http://www.usnews.com/usnews/culture/articles/050516/16lawn.htm

The point here is that while "agriculture" is labeled as the largest user of irrigation water, the fact is that residential and other lawn uses are probably the single largest crop use of water in the US. This fact isn't mentioned anywhere in the issue papers.

Pg. 22.
Draft reads: "In 2006, approximately 36,000 people were employed in agriculture, representing about one in ten Oregon jobs."

This statement is incorrect and seems to draw from 2 different sources. According to Employment Department data (unemployment info), about 36,000 jobs are associated with direct farm work year round or long enough to be included in this data system. However, at peak harvest season, the number of jobs climbs to over 120,000.

Further, it is the "linked" jobs associated with agriculture, such as those in the food processing sector, ag equipment, ag inputs (fertilizers, seeds, chemicals, irrigation, etc.), ag lenders, Extension agents, etc. that pull the number to 1 in 10 jobs associated with agriculture throughout the state. See: http://extension.oregonstate.edu/catalog/pdf/sr/sr1080.pdf

Pg. 23
Draft reads (first paragraph): "Processors produce everything from dairy products to wine, seafood items to fruit and vegetable products."

Processors don't "produce" food. They package, refine, cook, freeze, etc. Again, this sort of statement gives readers the mistaken impression that food can be "created" by food companies or the retailer. Thos are simply steps in the process of taking what is grown and putting it into another form.

Suggested language: "Food processors play a vital role in adding value to farm production by freezing, cooking, packaging, and transforming the produce into other product forms for consumers…. Oregon food processing companies employ over 21,000 people throughout the state…"

We suggest you move the discussion of food processing out of "manufacturing" on pg. 24 to be inclusive with the discussion of agriculture. Food processing is an extension of food production on the farm; and while "manufacturing" technology is employed, again – food is not "manufactured."

The Water and Recreation and Tourism Section:
Numbers used in the bulleted section are elongated, i.e., 7,053,000 versus 7 million; $453,752,389, versus, $454 million, etc. To be consistent with other sections, the rounded abbreviations are recommended.

Observations:
Pg. 23 -- The Water and Recreation and Tourism Section cites an Oregon Travel Impacts Report that notes direct travel spending totals $8.3 billion annually, etc. The report includes restaurant food consumption, gasoline sales, hotel expenses, museums, etc. The local aspect of this – what would be spent anyway—is very difficult to separate out from true "travel spending." This report is very generous in how it defines travel spending and the economic value and jobs associated with it.

Pg. 24 – 10 gallons of water use per every semiconductor chip produced is an astounding number! Production of ethanol received lots of criticism for the fact that it utilizes about 2.8 gallons of water per gallon of ethanol produced. What do semiconductor manufacturers do with their treated water? These would seem to be very large volumes?

The statement by the Oregon Business Development Department official seems very broad and perhaps selective as applied to certain types of businesses. Recommend not using this statement in this report.

Pg. 25. Hydropower receives very little discussion in these papers, yet it is still one of largest sources of base energy load in Oregon (over 40%), and likely the most reliable source of electricity, even though there are some fluctuations related to water supply.

<u>VI. Social Issues</u>.
Pg. 26: last paragraph.
Draft reads: "For example, in the recent past, policy skirmishes in the Klamath Basin decimated first agricultural production and the communities…"

Suggested language: "For example, in the recent past, policy skirmishes <u>that curtailed federal project irrigation water</u> in the Klamath Basin…"

Pg. 27. top of page.
Draft reads: "With increased competition for water, economic costs of treatment and distribution will also increase…"

There are lots of assumptions in this statement and it may not always follow this way. Variables include the type of "increased competition," whether economies of scale come into play, the entities involved, and whether legal challenges come to bear.

"Use of Water" section.
Only one sentence in this section on use, flexibility, etc. The rest of the section is on water scarcity, restrictions, curtailment plans, prohibitions… More on use to balance out the scarcity side of this would be beneficial and educational for readers.

"View of Water" section.
Heavily focused on tribes, perhaps overly so.
Draft reads: "From the tribal perspective, natural and cultural resources were plentiful and in a healthy condition during the 10,000 years of history, prior to the formation of the State of Oregon 150 years ago."

This is a very broad statement. It implies that the tribal organizations that exist today always existed as such and in the areas of current location, as well as the boundaries of Oregon. This is not accurate. It also fails to take into account droughts, fires, climate variations, the impact of Natives on the environment (there is always some impact), wars and disagreements between tribes, etc. that certainly would affect the "natural and cultural resources" in a "plentiful and healthy condition."

Pg. 29. The bullet addressing Tribal understanding and priorities mixes cultural/social issues with climate change impacts on tribes in WA state. While climate change is worth mentioning here, the example doesn't seem to fit the overall discussion.

Further, the link between water quantity, quality, ecology, economy and climate impacts is not limited to Tribes. These issues cut across all citizens in Oregon, including fishermen, agriculture, and others that rely on water as an integral part of their daily lives in many social, cultural, and economic ways.

<u>VII. The Implications of Climate Change.</u>
Pg. 32: The draft reads: "Northwest salmon populations are already at historically low levels due to a variety of human-induced stresses."

Broad statement. The issues are very complex and this paragraph oversimplifies many issues. Are all salmon species at historically low levels? Are all the causes of low levels due only to human-induced stresses? No discussion of other H's and causes (habitat, harvest, hydrologic cycle, hydroelectricity (dams), oceanic cycles) etc.
Is all climate change due to human causes? This paragraph implies it is.

Oregon Department of Environmental Quality
October 29, 2009 (email)

Water Quality Issue Paper Suggestions 10.29.09

Page 15, 4th Paragraph

Institutional Structures. Water managers operate in an institutional and regulatory environment that make coordination difficult, and lends itself to conflict. Responsibility for water quality resides at the Federal level with the U.S. Environmental Protection Agency (EPA), which approves water quality standards for each state. While states have the ability to develop water quality standards, they can only be as strict or more strict than Federal Standards. There are two sets of Federal laws governing water quality—the Clean Water Act and the Safe Drinking Water Act. The authority to implement and enforce these laws is delegated to the states. In Oregon, the Department of Human Services has authority to implement the Safe Drinking Water Act which regulates the quality of finished drinking water. The Department of Environmental Quality has authority to implement the Clean Water Act which regulates the water quality of streams, rivers, lakes, estuaries, etc…. The Oregon Legislature has delegated responsibility for water quality protection on agricultural lands to the Oregon Department of Agriculture and on forest lands to the Oregon Department of Forestry.

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Page 16, 4th Paragraph

Put simply, The Environmental Quality Commission (EQC) determines the beneficial uses for which each water body will be used, and then sets water quality standards for a variety of pollutants, in order to protect the most sensitive use. EPA must approve both the beneficial uses and water quality standards prior to their use in Oregon.

Matching beneficial use to water quality is a management strategy that the EQC and DEQ employ in recognition that not all beneficial uses require the same water quality. Take for example a water body where swimming and fishing is expected. Here, DEQ would set bacteria standards to meet human health standards; it would set toxics for both human health and aquatic life, and would set dissolved oxygen, pH, temperature, and turbidity standards for aquatic life. For another water body, designated for other uses, water quality standards may differ substantially.

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Page 17, 1st Paragraph

Setting Water Quality Standards. Oregon sets water quality standards for each pollutant as required by the Federal Clean Water Act. These standards can be narrative and/or quantitative criteria and they serve as the basis for Oregon's pollution control programs. The standards are used to set limits on the discharge of waste into Oregon's waters. Standards are also used to set requirements or establish Best Management Practices (BMPs) for nonpoint source control and land management programs, such as agriculture runoff, forest practices, and urban runoff. Failure to set and implement sufficiently protective standards can result in harm to fish and other aquatic life, human health, or recreational opportunities. These impacts, in turn, can have a negative effect on quality of life and economic development.

Figure 1 shows surface water quality conditions in Oregon. In accordance with the Federal Clean Water Act, the Oregon Department of Environmental Quality assesses the state's water quality and reports to the EPA on the condition of Oregon's waters, identifying waters that do not meet water quality standards and where a Total Maximum Daily Load (TMDL) then needs to be developed. DEQ is currently working on a report due to be submitted to EPA in April 2010.

Page 18, 2nd Paragraph, 2nd Bullet

"Water-quality limited" designations and Total Maximum Daily Load (TMDL) issuance, put in motion regulatory water quality improvement actions by the State. Solutions can include more stringent pollutant discharge limits for point sources, changes in BMPs for nonpoint sources.

Various techniques, such as point source pollution management, nonpoint source pollution management, and restoration efforts can protect and restore water quality over time.

Page 19, 1st paragraph

Integrated planning efforts could alter how we characterize water that was previously viewed as a "liability" to communities. Treated effluent, graywater, and storm water could be re-used and could supply certain beneficial uses before discharge.

Page 20 2nd bullet

- Ensuring good water quality requires significant funding, which brings with it equity issues. Who should for pay clean water?
- How do we capture the hidden monetary benefit from having clean water and avoid the trap of the "Tragedy of the Commons"?

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Comment [cs1]: I suggest taking this last part out as it is a bit unclear what the intent is. Let me know if you want to talk more about it and I can help.

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Comment [cs2]: "Graywater" is now one word☺ I just learned that…

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Oregon
Theodore R. Kulongoski, Governor

Department of Geology & Mineral Industries
Administrative Office
800 NE Oregon Street #28, Suite 965
Portland, OR 97232
PHONE 971-673-1555
FAX 971-673-1562

Date: October 27, 2009

To: OWRD Integrated Water Resource Strategy Team

From: Vicki S. McConnell, Director DOGAMI

Subject: Feedback regarding draft Integrated Water Resource Strategy

Thank you for soliciting comments from your stakeholders and other state agencies. We have read the Preliminary 2009-2012 Work Plan: Oregon Integrated Water Resources Strategy and the Oregon Integrated Water Resources Strategy Issue Papers. We offer the following comments:

Preliminary 2009-2012 Work Plan

- You have developed an excellent work plan considering the time and funding limitations.
- We highly recommend that the Chief Scientist from Oregon Department of Geology and Mineral Industries be included on your Technical Advisory Group(s).

Oregon Integrated Water Resources Strategy Issue Papers

- We applaud your comments under the section of *Value of a Strategy* that recognizes the fact that exploitation of water resources must be managed. In order to accomplish this you must understand the limitations of the resource and it's potential.
- We suggest that a bullet be added to Water Quantity issue paper section ***Key Challenges, Research, and Technical Questions*** that addresses the need for determination of groundwater resource potential based on integrated modeling and 3 dimensional groundwater basin analysis.
- We note that in the issue paper addressing Water Quality there is no discussion of the role and responsibilities of Department of Human Services Office of Environmental Public Health.
- We recommend that a section be added to Economy issue paper that addresses water and mining, in particular aggregate mining.
- We recommend that the **Implications of Climate Change** issue paper be expanded to include the notion that the state will be responding to the impact of climate change and that not every impact will be considered a risk.
- Note also that the climate change impact to the coast is not limited to the impact of sea-level rise. Sea-level rise impact to the Oregon coast will not be as severe as to the Atlantic Coast. Increased wave heights of storm surges and increased frequency of intense storms are already

occurring and are impacting the coastlines, developed areas, and estuaries. Sea level rise will only exacerbate those impacts.

- We recognize the challenge of developing an integrated water resource strategy against the backdrop of other natural resource and human health policies such as global warming, climate change, the Oregon Plan, renewable energy resource goals, etc. Your process appears is well thought out and comprehensive.

Oregon
Theodore R. Kulongoski, Governor

Department of Land Conservation and Development
Director's Office
635 Capitol Street NE, Suite 150
Salem, Oregon 97301-2540
Phone: (503) 373-0050
Fax: (503) 378-5518
www.oregon.gov/LCD

October 29, 2009

TO: Brenda Bateman, OWRD Senior Policy Coordinator

FROM: Richard Whitman, Director

CC: Rob Hallyburton, DLCD Planning Services Division Manager

RE: Integrated Water Resources Strategy

We have reviewed the September 10, 2009 preliminary work plan and issues papers related to your Integrated Water Resources Strategy effort. We found that the proposed work plan is clear and logical and the working papers provide thorough background on relevant issues. The work plan provides ample opportunity for public participation. The role of the statewide land use planning program in managing water resources is appropriately noted.

We are pleased to see that the implications of climate change will be given particular consideration, as this department is spearheading development of a statewide climate change adaptation plan, to be drafted during this biennium. We anticipate water resource considerations will be a prominent issue in this endeavor, and look forward to coordinating our efforts.

We appreciate the opportunity to review and comment on the early materials related to this important project. We plan to remain involved as you carry out the work plan and develop the strategy, and we are available as a resource as needed.

Oregon Department of Transportation, GEO-Environmental
Frannie Brindle
September 25, 2009 (email)

To Whom it May Concern,

ODOT would be interested in exploring opportunities to mitigate for riparian impacts, water quality impacts and fish passage blockages by using mitigation funding to purchase water rights. Perhaps this could be done on a watershed basis. When policies and strategies are developed, we could appreciate it if the options to purchase water rights is allowed as mitigation credit.

One idea to ensure that the strategy is comprehensive would be to take the hydrologic cycle and explore how each agency's business lines and authorities might influences the cycle. This would provide a scientific basis for the foundation of the strategy and would ensure that important pieces were not missed. For example, the strategy misses the influence of healthy forests with large canopy that trap moisture, cool air and allow snow to form and accumulate, permeable organic soils that filter water, and vegetation that protects soils from compaction so that water recharge is optimized. I assume that the water storage/recharge role of forests was missed by the fact that the stakeholder group is missing forest management expertise.

Thank you for the opportunity to comment as this is a very worthwhile effort.

Frannie Brindle
ODOT Geo-Environmental
Natural Resource Unit Manager
503-986-3370

SDAO Special Districts Association of Oregon

October 29, 2009

Dr. Brenda Bateman
Senior Policy Coordinator
Oregon Water Resources Department
725 Summer St. NE, Suite A
Salem OR 97301-1271

Dear ~~Dr. Bateman~~: Brenda

At the outset, I would like to thank you, Director Ward, the Oregon Water Resources Commission and the department for the tremendous amount of effort, expertise and work that has been exhibited in the development of the *Draft Oregon Integrated Water Resources Strategy Issue Papers*. The Special Districts Association of Oregon (SDAO) representing, among others, municipal water providers and sanitary districts throughout the state is excited to support the development of this strategy. Our members are committed to resource protection and environmental stewardship while also providing our citizens and businesses with clean, safe drinking water and affordable and effective water treatment.

We would like to extend our appreciation to the Department and the Commission for seeking our input to date; and we regret that due to scheduling constraints we have not had the opportunity to meet with you to conduct a SWOT analysis. We are hopeful that we can arrange a time in the not-too-distant future to do so.

As one of only two western states without an explicit water supply strategy Oregon has the opportunity to learn from others and develop a nimble strategy that can evolve over time. With climate change and population growth, Oregon's seemingly abundant water resources and quality, both above ground and below ground, will be under increasing stress. Water quality and scarcity present real challenges not only to our natural environment but also to the health, welfare and quality of life that our citizens have come to expect and demand. As a result, SDAO fully supports the development of a Statewide Integrated Water Resources Strategy that recognizes the important roles that we play as stewards of the environment, as catalysts for economic development, and as providers of drinking water to a large percentage of our state's citizens and businesses.

After reviewing the draft issue papers, three general issues were striking. It is surprising that as a state we lack the necessary data that could tell us how much water there is. In other words, how much water each basin yields. Secondly, it is clear that we as a state lack the fundamental data on what the impact of water has on our state's economy. Finally, we also feel that the section related to how municipal water supply impacts the economy needs greater detail. We have offered some preliminary language below on this last point, but would also like to

P.O. Box 12613 | Salem, Oregon 97309-0613 | PHONE: 503-371-8667 | TOLL-FREE: 1-800-285-5461 | FAX: 503-371-4781 | WEB: www.sdao.com

encourage the department to work with the Drinking Water Program at DHS and the Oregon Business Development Department.

We would also like to make three other suggestions. First, we feel that it would be helpful to include the Drinking Water Program as part of the project team to develop this strategy. Public health is a vital service that we as municipal suppliers provide and not having the participation of the Drinking Water Program creates, what we believe to be, a substantial and important expertise gap in the development of the overall strategy. Secondly, we also believe that it is important to describe how much water each sector presently uses of the state's water resource. This could be done both with data and with graphs. Providing this information provides the reader an understanding of how the water of this state is presently allocated. Finally, we also believe that particular attention and further space should be given to DEQ's work on comprehensive toxics reduction efforts. There are many non-point sources that come from both the air and land and it will be important to integrate non-point source reduction efforts into any comprehensive water resources strategy.

SDAO would like to offer the following specific comments, not as criticism, but with the hope and intention of improving or clarifying what we believe to be an excellent beginning attempt at framing the challenges and opportunities that lie before us collectively.

As stated previously, under the issue paper "Economy," we believe that the text is inadequate in describing the importance of municipal water providers. As a result we offer the following preliminary text under the sub-title "Water and Municipal Use" after the first paragraph. We further recommend that the Drinking Water Program at the Department of Human Services be consulted to provide further details and data to the suggestions below.

> "Municipal water supplies deliver a variety of benefits on behalf of the public. Examples include the public health benefits by providing a safe supply of water; fire protection is achieved by providing water in the necessary quantities and pressure to allow for fire suppression; and support for the local economy is achieved by delivering a reliable supply of water that is used in all facets of providing goods and services.
>
> The recipients of municipal water services vary enormously. Both cities and water districts have large and small populations which cover dense and sparse areas. Municipalities experience different geographic and environmental circumstances relating to their water sources. Some cities and districts may have a source within their incorporated boundary while others may rely on sources many miles away. Several municipalities exist in extremely wet areas of the state while others experience arid climates. Other municipalities may utilize a water source in which an aquatic species is listed under the Endangered Species Act, or is water quality limited under the Clean Water Act, or is located in a groundwater protection area. However, given all of these differences, municipal

water suppliers have one thing in common – the need to continually plan for their system's development.

Municipal suppliers (cities and districts) are formed by a vote of the affected people to, among other things, provide services. Upon formation, the municipality is duty-bound to serve all citizens and customers who locate within the boundary. Municipalities cannot wait to see how growth occurs. They can only make good-faith predictions of what growth might occur and be ready to serve that need before it occurs."

SDAO and the League of Oregon Cities are working with the Oregon Department of Human Services Drinking Water Program to quantify the number of Oregon residents served by municipal water providers. We have also made inquiries with the Oregon Business Development Department attempting to quantify the number of businesses that are served by municipal providers.

Comments for the Introductory Issue Paper:

Page six; the first full paragraph states that "degradation of ground water and surface water quality also decreases the volume of fresh water available to consumers, and to replenish streams and aquifers." Technically this is a misleading statement. The degradation of water quality does not mean that the water goes away. Rather, it might mean that the water requires increased treatment. Furthermore, if the degradation is defined as simply meaning that the stream is on the water quality limited list for temperature that does not mean that the volume is decreased. As an alternative, perhaps the point should be that degradation of ground and surface water quality presents challenges to water users, providers and the environment.

Page six; the third full paragraph states that "An integrated water resources strategy will need to recognize the 'inextricable link' between water quality and water quantity…" There is validity to this statement but increasing the amount of water released does not necessarily mean that the water quality will improve. The use of the word "inextricable" fails to recognize that the type of water released also has a significant impact on the quality of the water.

Comments for the Water Quantity Issue Paper:

Under Background Information, the second sentence of the first paragraph states that "Surface water is almost completely allocated," we recommend that you consider inserting a qualification that says "during times it is needed most." We also recommend that in the last sentence of the same paragraph you insert the word "patterns" between the words "precipitation" and "predicted." Our understanding is that climate scientists are not saying we are going to receive less precipitation in the NW; it is just going to come in different forms (rain vs. snow), frequencies, and times of year. Additionally, we

request that you include the word "storage" within the last bullet under Key Challenges, Research and Technical Questions as a source of water that Oregon should be "considering/developing."

Comments for the Water Quality Issue Paper:

Under Background Information, the second sentence of the second paragraph states that "protecting greater quantities of water instream allows Oregon to more easily satisfy state and federal water quality standards." Yet in the middle of page 18 there is a statement that dilution of pollutants is "increasingly... falling out of favor." The question that this brings up is on one hand the statement has been made that we need more instream volume to improve water quality but on the other hand there is a statement that that dilution is not a solution. This creates confusion and should be clarified. Additionally, on page 19 the paper provides a point-source example (pharmaceuticals) but fails to provide a non-point source like pesticides or fertilizers. Finally, under the bullet "Natural conditions" perhaps another question is whether we "*can*" actually accomplish this.

Comments for the Economy Issue Paper:

We are unclear on how the paragraph on page 23, that begins with "Oregon's scenic wonders..." relates to water. Perhaps better examples should be identified. On page 24, the first paragraph states that most Washington County manufacturers are served by municipal suppliers. We believe that this is largely true for the other counties that are identified in the same paragraph. Perhaps consulting with the Oregon Business Development Department would be beneficial to gaining a fuller understanding of the point that is being made here.

Additionally, we are uncomfortable with the last paragraph under the heading of "Water and Manufacturing" on page 24. Relying on one individual's opinion or experience does not make something true. There could very well be an example of a recruitment failure that was based on water quantity or price. Alternatively, there are examples of recruitment successes were water quantity, quality and price were important factors in manufacturing recruitment successes (We are confident that Hillsboro can provide you with further information). Furthermore there are other important considerations that a company must study before making a siting decision including workforce skills, a host of transportation considerations, business climate, land availability, zoning, whether or not the necessary water and wastewater capacity exists, just to name a few. As a result, consideration should be given to modifying or elimination of this paragraph.

Comments for the Social issues Paper:

We are not entirely clear that this issue paper brings us any closer to the development of a statewide integrated water resources strategy. Although we recognize the importance of water to our native cultures and society as a whole, we are simply perplexed on why or whether this document is necessary. We would recommend that this document be eliminated. However, in the event that this issue paper remains we would offer the following suggestions:

We recommend the removal of the last sentence in the first paragraph. The statement ignores the fact that water is transportable and there are countless examples of this in Oregon and all over the world. In the background section on page 26, we also question whether the WRD and other participating state agencies are in a position to address whether or not water is a "human right." We don't believe that this is the role or responsibility of the impacted departments. We also do not believe that the strategy should address this topic. Additionally, we recommend that the bullet "Conduct a survey of statewide conservation programs, resources and incentives" be moved to another issue paper – perhaps under "Water Quality." Finally, we would recommend that the paper explain or define what "environment justice" means.

Comments for the Implications of Climate Change Issue Paper:

The last sentence of the first page fails to recognize that the water systems that serve the greatest population concentrations in the state are not snow pack dependent systems. Perhaps qualifying this statement would provide the reader with a more accurate understanding.

Again, thank for the opportunity to provide SDAO's comments on the "Draft Oregon Integrated Water Resources Strategy Issue Papers." We stand ready and willing to provide further participation and assistance in development, production and execution of this important strategy now and in the future.

Sincerely,

Mark Landauer

cc: Oregon Water Resources Commission
Oregon Environmental Quality Commission
OWRD Director Phil Ward
DEQ Director Dick Pedersen

Ms. Christine Svetkovich
Mr. Bruce McIntosh
Mr. Ray Jaindl
Mr. Mike Carrier

Staff Comment
Water Resources Field Staff
October 21, 2009 (email)

On Page 16 of 38, Dept. of Agriculture is seemingly left out of the equation in that they also use the term "beneficial use". As seen in their OAR 603-095-3940, ODA also utilizes the definition in a couple of reports, including their "The Agricultural Water Quality Program and Streamside Landowners", the Strategic Plan Yamhill SWCD 2007 - 2012 (pg. 9 of 15) and North.& Middle Forks John Day River Water Quality Management Area Plan (pg. 13 and 22 of 36).

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WATERWATCH

PROTECTING NATURAL FLOWS IN OREGON RIVERS

October 30, 2009

Brenda Bateman
Water Resources Department
725 Summer Street N.E., Suite A
Salem, OR 97301

Re: Comments, Oregon Integrated Water Resources Strategy Draft Issue Papers

Dear Ms. Bateman,

Thank you for the opportunity to comment on the WRD's draft Oregon Integrated Water Resources Issue Papers. The bulk of our comments will correspond to the individual issue papers and are best read in conjunction with the papers; however there are a couple general points that pertain to the document as a whole.

1. OWSCI Demand Forecasts: First, while the data generated from the OWSCI process can be useful for some select purposes, we do not believe that the issue papers or the ultimate integrated water resources strategy should rely on the results of OWSCI to guide policy direction. The WRD readily acknowledges that the results for OWSCI represent a modest data collection effort that set the stage for additional work the WRD needs to conduct to analyze the state's water needs and water supplies. See WRD Staff Report to the WRC, Agenda Item E, Integrated Water Resources Strategy Work Group Update, Work Session Item E, September 10, 2009. The data is simply a building block that represents initial data collection efforts. It does not provide a definitive conclusion with regards to state water demands, whether instream or out-of-stream. Given this, we are troubled by repeated reliance throughout the "issue papers" on OWSCI demand forecasts. While we have no objection to the description of OWSCI as an ongoing data collection tool, we feel strongly that any reliance on this data to define instream and out-of-stream needs be deleted from the document (i.e. pages 8, 22, 23).

2. State Strategy vs. Toolbox for Communities: Second, the statutory mandate is for a state strategy to meet instream and out-of-stream needs that includes, among other items, objectives, actions needed to implement the objectives and policy recommendations. In reading the statute as a whole (new and existing provisions of ORS 536.220), it is clear that the legislative intent and direction is that this strategy be a "state" strategy, for the state to implement and enforce. With this as a background, we are troubled by statements throughout (as well as in the corresponding "workplan") that might lead the reader to believe that this planning effort's end result is the creation of a "toolbox" that local communities can make use of if they so choose. While a "toolbox" may in fact be one component of the end strategy, it should not constitute the strategy as a whole. Any references that lead the reader to believe this should be deleted.

Main Office: 213 SW ASH SUITE 208 PORTLAND, OR 97204 TEL: 503-295-4039 FAX: 503-295-2791 Visit us at:
Field Office: 27 NORTH IVY STREET MEDFORD, OR TEL: 541-772-6116 FAX: 541-779-0791
www.waterwatch.org

Comments specific to the Integrated Water Resources Strategy Issue Papers:

Issue Paper 1: Introduction (pgs. 5-9)

The statutory mandate of this planning exercise is to develop a strategy that is designed to meet Oregon's instream and out-of-stream needs. ORS 536.220(3)(a). This is a refinement of the underlying mandate to formulate and enforce a coordinated, integrated state water resources policy that, among other things, is designed to encourage, promote and secure the maximum beneficial use and control of such water resources and the development of new supply. ORS 536.220(2). WRD is directed to work in close cooperation with DEQ and ODFW to develop the plan, in consultation with other agencies, tribes, stakeholder and the public. Id. The plan is to be an "action" plan for the state now and into the future. We suggest that the introduction section be simplified to simply make the statutory background clear.

In addition to the statutory background, this is a good place to outline the many facets that are necessarily involved in meeting the mandate of addressing Oregon's instream and out-of-stream needs. These include, but are not limited to: instream flow protection and restoration, out-of-stream development opportunities (above and below ground), water management (i.e. measurement, enforcement, planning), conservation/efficiency, etc.

While not critical, it might also be helpful to put the importance of managing Oregon's water resources in context by supplying some basic facts such as the fact that Oregon has more than 100,000 miles of rivers, over 6.200 major lakes and nine major estuaries, groundwater makes up approximately 95% of the freshwater resources in Oregon, etc.

- A limited supply of clean and abundant water (pgs. 5-6):

We'd suggest that the first paragraph be deleted.

We think the second paragraph is a good start, but could be expanded a bit by adding a bit more information on water quantity, water quality (i.e. more than 13,300 stream miles are listed for at least one water quality pollutant, groundwater contamination, etc) and the general state of the fishery resource (i.e. the number of threatened and endangered fish species in Oregon).

- The value of a strategy (pg. 6) :

The value of a strategy is well laid out in the first paragraph of this section.

In the second paragraph, while we agree with the statement that there is an inextricable link between water quality and quantity, it is less clear why addressing economic and environmental needs will recognize this link. These seem to be two different concepts and thus we recommend addressing these points separately.

As to the purposes served, our understanding is that this list is taken from planning documents of the American Water Works and is not necessarily completely transferable to this planning effort (see http://waterencyclopedia.com/Hy-La/Integrated-Water-Resources-Management.html) This list was drafted to address consumptive use supply issues. Moreover, many of the terms are not commonly utilized in Oregon water law and policy and will likely add confusion (i.e. natural water systems basis). We suggest deleting this section as written. It could be either deleted

entirely, or replaced with a section that discusses the value of integrating water quality and quantity, and fishery needs specific to Oregon's goal to meet instream and out-of-stream needs.

We also suggest that this section provide additional clarity with regards to the mission statements and goals of the three lead agencies (WRD, DEQ and ODFW), which this integrated strategy should be designed to help meet. This could include:

> WRD: The Department's mission is to serve the public by practicing and promoting responsible water management through two key goals: 1) to directly address Oregon's water supply needs, and 2) to restore and protect streamflows and watersheds in order to ensure the long-term sustainability of Oregon's ecosystems, economy, and quality of life.
>
> DEQ: The Water Quality Program's mission is to protect and improve Oregon's water quality. Protecting Oregon's rivers, lakes, streams and groundwater quality keeps these waters safe for a multitude of beneficial uses such as drinking water, fish habitat, recreation and irrigation.
>
> ODFW: To protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations (note: augment with the goals of their water quantity program).

- <u>Building a Foundation of Data (pg. 7):</u>

The governing statutes call on the WRD to work in close cooperation with DEQ and ODFW to develop data on an ongoing basis. ORS 536.220(3)(c). This section should be reworked to outline that mandate.

As to the existing content, while we agree with the statement that there have been a plethora of plans and studies focused on water quantity, quality, etc., the assertion that the OWSCI process is pulling together these many studies is not entirely accurate. OWSCI sets forth preliminary data with regards to storage sites, limited conservation opportunities, and initial demand forecasts. It does not compile, catalog, or otherwise coalesce the many other studies/information sets that might be useful to building a foundation of data. We would suggest outlining, briefly, the data that OWSCI has begun to compile, but then also expand the discussion to include mention of some of the key studies and plans that exist that should be folded into this planning process such as the Oregon Plan (and the Steelhead Supplement), Oregon State of the Environment Report and Statewide Summary 2000, Water Quality Water Quantity Task Force Report of 1997, ODFW's Peak Flow/Ecological Flow Guidance Policy, WRD's Strategic Plan for Managing Oregon's Water Resources 1999-2001, the WRC 2000 Strategic Measurement Plan, existing statewide groundwater studies (i.e. Deschutes, Klamath), 1998 Stewardship and Supply Initiative, relevant climate change studies, etc.

- <u>Developing a strategy through collaboration (pg. 7):</u>

This section should outline the legislative mandate for WRD to closely coordinate with ODFW and DEQ both in developing the strategy, but also ongoing collection of data on instream and out-of-stream needs.

- Conclusion (pg. 7):

In our view, the plan is less of a "persuasive visualization" than a true action plan, or blueprint, for the state. This strategy will contain objectives, actions, policy recommendations and enforcement provisions. It will necessarily touch upon a wide spectrum of issues/actions that will directly or indirectly help the state meet the goal of meeting instream and out-of-stream needs (i.e. management, conservation, supply alternatives, etc). We suggest this section be reworked to discuss this framework, and refer back to the "blueprint" language found in the Value of a Strategy Section. The conclusion would also be a good place to briefly lay out the various components that will necessarily need to be addressed to meet the statutory goal (i.e. instream flow protection/restoration, consumptive supply options (above/below ground), water management (i.e. measurement, enforcement, planning), conservation/efficiency, etc).

Issue Paper 2: Water Quantity (pgs. 8-14)

- Background information (pgs. 8-9):

We would suggest that the WRD look to some of its existing documents that outline the state of Oregon's water resources for guidance and/or specific language to add to this section (i.e. WRD's Strategic Plan for Managing Oregon's Water Resources 1999-2001).

We would recommend deleting the information in paragraph 2 (page 8) related to OWSCI. As noted above, OWSCI represents a limited set of data points that while useful for some exercises, should not be relied upon to build a statewide strategy.

We are especially concerned about the assertion that existing needs of fish and fish habitat compared favorably with existing flow protections in some basins such as the Sandy, Deschutes, Grand Ronde, Klamath and John Day. Instream water rights in these basins are routinely not met in many if not all of these basins. In fact some of these streams have tributaries that go completely dry during the irrigation season. Restoration efforts are taking place in most of these basins to try to restore balance, but far from complete in any basin. It misleads the reader to imply that flow protections in these basins are somehow adequate. [1] This should be deleted.

- Groundwater (pgs. 11-13):

We would suggest some basic information on the importance of groundwater to our state. DEQ's 2009 Report the Legislature, Groundwater Protection in Oregon provides some good basic facts that might be incorporated here, i.e.

-Groundwater makes up approximately 95% of available freshwater resources.
-Groundwater is the primary source of drinking water and its use is increasing (approximately 70% of all Oregon residents rely solely or in part on groundwater for drinking water).
-Oregon's businesses require clean groundwater for industries such as food processing, dairies, manufacturing, and computer chip production.
-Groundwater provides irrigation water for Oregon agriculture and water for livestock.

[1] Moreover, there is disagreement amongst stakeholders as to OWSCI's data set regarding instream flows (i.e. did not account for peak/ecological flows, sets forth data in annual acre feet demand rather than monthly flow, etc).

> -Groundwater supplies base flow for most of the state's rivers, lakes, streams and wetlands. In many streams, the inflow of cool groundwater may be essential to reduce stream temperatures to the range requited by sensitive fish species.

DEQ Legislative Report at 2.

We would suggest that the groundwater section include a short discussion of the both the increasing understanding of the surface water/groundwater connection and the effect this understanding is having on groundwater appropriation. It could also mention the existing groundwater studies, as well as noting the need for further groundwater investigations statewide.

This section should also make brief mention of 1) exempt wells and the challenges they pose to water management, and 2) aquifer storage and recovery opportunities.

Finally, at the end of the discussion on the withdrawn basins and the aquifer of concern, it would be useful to mention that in the Deschutes Basin, because of the connection between groundwater and surface water and the fact that instream water rights and scenic waterways are not being met, any new groundwater use must provide mitigation.

- <u>Key Challenges (pg. 13):</u>

Basin Yield: Any call for a basin yield analysis should go hand-in-hand with a request for peak flow and ecological flow analyses. To do a basin yield analysis in the absence the peak/ecological flow work will lead to false expectations about the amount of storage in any given basin. This issue was a subject of discussion in the 2007 Legislature, when the Legislature chose <u>not</u> to fund basin yield studies as part of the OWSCI process. If language on basin yield is included, language calling for the statewide determination of peak and ecological flows should also be included (it should have its own bullet point).

Statewide Groundwater studies: As we understand it, there is nearly universal support amongst stakeholders for the undertaking of new groundwater investigations around the state. This is a key piece of data that is necessary for the proper management of our groundwater (and hydrologically connected surface water) resources. This needs to be highlighted in this section (it is called out in the conclusion, but not found in the body of the paper).

Comparison of reconciliation of out-of-stream needs (usually in units of volume) and instream needs (usually measured as flow): Most out-of-stream water rights do in fact have a rate attached to them. The state's water availability model also is calibrated for both instream and out-of-stream uses in terms of flow. In recent years the WRD has been characterizing water needs in terms of volume, or annual volume. WaterWatch has raised repeated objections to this approach as it ignores the timing issues of actual flow in rivers. We are unclear of the purpose here.

Water Management: Water management is necessarily a key provision of any integrated water resources strategy. This section should explicitly call this out. It should also note the challenges faced by WRD, ODFW and DEQ in implementing/enforcing management provisions in the face of multiple goals relating to water (i.e. quantity, quality and ecological needs).

Identify political, economic, or regulatory tools that address any gaps between water needs and water supplies: this plan is not simply a "supply" plan, but rather a state water strategy. This section should be broadened to include gaps in management, enforcement, etc.

Statewide plan with regional application: One of the challenges in developing this strategy will be to tailor a statewide "blue print" that will be useful to each of Oregon's individual river basins. A bullet point should be added to capture this point as it is an unresolved issue/challenge.

Climate change: We support the language on this, however it should be expanded to capture the concept that water management as we know it today will likely need to adapt to the changing climate.

Instream needs: Many streams lack instream water rights. ODFW has long sought to both develop data needed to support additional instream water rights, or advance instream water right applications where data already exists. Moreover, DEQ has only a handful of instream water rights to protect flows for water quality purposes across the state. This is a key challenge as we move forward in protecting and restoring streamflows.

Endangered Species Act: There are a number of listed fish species in Oregon. This is a key factor for many water allocation, reallocation and policy decisions and should be stated here. Moreover, meeting the mandates of the Oregon Plan continue to be a challenge.

Funding and adequate agency resources: Lack of funding and lack of agency staff are a key challenge to adequate water management in this state. This should be called out here.

Incorporating existing guidance documents/policy: In developing the strategy the state should evaluate key guidance documents and policies and identify shortfalls in implementation. For instance, a number of the WRD/DEQ/ODFW directives in the 1997 Oregon Plan have not yet been achieved. This strategy exercise provides a good forum for developing a strategy to meet the objectives/goals of the plan. Moreover, there are a number of WRD policies that if fully utilized would help the state to meet its goals (i.e. Conservation and Efficient Water Use, OAR 690-410-060).

- <u>Conclusions and Next Steps (pg. 13):</u>

Paragraph two states that basin yield analyses are needed statewide. If this section is going to include a statement that basin yield analyses are needed statewide, it needs an accompanying statement that ecological flow and peak flow analyses are needed statewide. Failure to include this will result in an inaccurate understanding of "what naturally occurring water many be available for planning purposes." Without corresponding language related to peak and ecological flows, WaterWatch objects to the inclusion of the basin yield language.

<u>Issue Paper 3: Water Quality (pgs. 15-20)</u>

- <u>Background Information (pg. 15):</u>

We suggest that this section include language WRD developed as part of its work in the Water Quality Water Quantity Task force to help frame the issue, namely:

> Water Quality and water quantity are unequivocally related. As Oregon's population continues to grow, more demands are placed on our water resources from industry, irrigation, municipal use, recreation and instream uses. A fundamental state priority, implicit in state natural resource agency missions, is to achieve a balance between healthy, clean watersheds and waterways, viable fish and wildlife habitat and adequate and safe water supplies to support growth and maintain existing needs. In Oregon, multiple state agencies have regulatory authority over different aspects of water management, making agency coordination imperative and management of the resource a challenge.

See A Report by the Water Quality Quantity Task Force, February 1997, at pg. 2. The WRD might also consider including the language on the various agency roles, and its relationship to water quality/quantity management.

We'd also suggest that the background section including a brief synopsis of the state of Oregon's water quality today (i.e. how many stream reaches are listed as water quality limited, key issues related to flow (i.e. temperature, etc)). We suggest WRD coordinate with DEQ on obtaining this information.

- <u>Surface Water (pg. 17)</u>

It would be helpful to have a narrative describing the state of the state's surface water with regards to water quality. While we appreciate the inclusion of the map, it is difficult to see (especially if printed in black and white). It would also be helpful to lay out some of the bigger threats to surface water quality in Oregon (past and future).

- <u>Groundwater (pg. 18)</u>

It would be helpful to have a general statement about the state of Oregon's groundwater, and the general threats and/or avenues of contamination with regards to water quality it faces. The Groundwater Quality Protection in Oregon 2009, DEQ's Report to the Legislature has some useful information that could be inserted into this general discussion, i.e.

> Groundwater is present beneath almost every land surface and is sometimes at very shallow depth. It is vulnerable to contamination from activities that take place on the land as well as from discharges of wastes and pollutants at or below the ground surface. Once groundwater becomes contaminated it is very difficult to clean up. Because groundwater moves very slowly, the contamination may persist for tens, hundreds, or even thousands of years. Likewise, groundwater that is currently being contaminated may not affect beneficial uses until some time far into the future. The contamination may impair groundwater for use as drinking water and may affect the quality of the surface waters where it comes to the surface.

Executive Summary, The Groundwater Quality Protection in Oregon 2009, DEQ's Report to the Legislature.

- <u>The Potential Consequences of Neglecting Water Quality in Planning (pg. 18):</u>

This section should have a bullet point dedicated to the potential consequences on aquatic species and habitat.

- The Benefits of Integrating Water Quality and Water Quantity Planning (pg. 18):

We suggest that WRD work with DEQ and ODFW to outline the benefits to each agency, water users and the environment of integrating water quality and water quantity planning. While this section outlines coordinated management of treated effluent, gray water and storm water, we would anticipate that there would be wider spread benefits.[2]

- Key Challenges, Research and Technical Questions (pg 19):

Natural Conditions: we are unclear of the inclusion of this concept here. It was not part of the body of the issue paper, so it is unclear to the reader its relevance.

Instream water rights: In 1997 the Water Quantity Water Quality Task Force identified lack of agency resources as an impediment to adequate use of the state Instream Water Rights Act. This is still a key challenge today. To date, no more than a handful of instream water rights were applied for by DEQ. There was some discussion of having NPDES permit holders fund DEQ to apply for instream water rights to protect base flows, but to our knowledge this concept has not moved forward.

Integrated public interest review of water right transfers. Given the over appropriated state of Oregon's surface water, there is a huge reliance on the transfer process to reallocate water. The transfer process of review includes an "injury" review with regards to other water right holders, but does not include a comprehensive public interest review. Thus, if a transfer would result in water quality degradation but there is no water right that is "injured" then the transfer would be approved. This was identified by the Water Quantity Water Quality Task Force in 1997 as an issue and should be included here.

Issue Paper 4: Ecology (not drafted as of date of these comments)

Issue Paper 5: Economy (pgs. 22-25)

- Water and Commercial Fisheries (currently omitted):

The document should include "Water and Commercial Fisheries" section. While the recreation section touches upon the economic value of recreational fishing, there should be an entire section devoted to the value of healthy rivers to Commercial Fisheries. According to 2007 report by ODFW and OCZMA, Oregon's commercial fishery brings 421 million dollars to the Oregon Economy. See Oregon's Commercial Fishing Industry, Year 2005 and 2006, 2007 Outlook, ODFW, OCZMA, http://www.dfw.state.or.us/fish/commercial/commercial_fishing_report.pdf

- Water and Tribal Use (currently omitted):

This document should include a section on tribal use of water.

[2] Moreover, it should be noted that reuse could in fact result in lower return flow to streams, thus reuse should not be an assumed benefit to a stream system but rather an option, that if it meets environmental standards.

- Water and Agriculture, pg. 22

We request that you delete the reference to the OWSCI demand forecast. As we understand it, OWSCI did not generate the information related to agricultural use, it only states this fact. That 85% of water is diverted for agriculture is a well known fact that likely does not need to be attributed. If the WRD feels that it needs citation, we'd suggest using source documents (i.e. USGS).

- Water and Recreation and Tourism, pg. 23

This section should include information found in an economic report prepared for ODFW called "Fishing, Hunting, Wildlife Viewing, and Shellfish in Oregon, 2008 State and County Expenditures Estimates, May 2009, Prepared by Dean Runyan Associates for Oregon Department of Fish and Wildlife and Travel Oregon. This study found that 2.5 billion dollars were generated by Oregon residents and non-residents participating a fishing, hunting, wildlife viewing, and shellfish harvesting.

- Water and Municipal Use:

We request that you delete the reference to the demand forecast by OWSCI. This also is a well known fact that can be attributed to sources such as USGS, or can be left unattributed.

This might be a good place to discuss the value to cities of clean water (whether surface or groundwater) in relation to water treatment facilities. Moreover, for many cities, having a healthy river for its citizens to enjoy also adds economic value to the city as a whole (i.e. Bend).

- The Benefits of Integrating Economics into Water Planning, pg. 25

This section should contain a statement that recognized the economic value of keeping water instream, in addition to the economic value to consumptive users.

Issue Paper 6, Social Issues (pgs. 26-29)

This section should include a description of historical versus current values. Many attempts to move towards better water management are stymied by basic philosophical objections to changing values. This should be captured somewhere.

- Key Challenges, Research and Technical Questions (pg. 28)

Funding issues: this section should identify funding issues as a key challenge. The issues under this are very broad and include fees (administration, services, water), incentives, cost share opportunities, etc.

Value to all of instream flows: this section should touch upon the many values associated with restoring and protecting water instream. This is a large social issue that often times is relegated to a secondary position.

Issue Paper 7, Implications of Climate Change (pgs. 30-34)

- Background information, pg. 30

While this section notes that agriculture, food production and municipal supplies will be affected by climate change, the effect on aquatic species and ecosystems is not mentioned. This should be inserted.

This section briefly discusses the Oregon Climate Change Research Institute, and its lack of funding to complete identified studies that are "downscaled" to be useful to Oregon. The message this imparts is that there is not currently any data, or won't be, anytime in the near future because of lack of funding. While it unfortunately may be true that OSU's program is under funded, we do think it worthwhile to mention the studies that are underway or do exist. For instance, it is our understanding that the WRD is also working with the University of Washington's Climate Impacts Group on obtaining more basin specific information for Columbia River tributaries. CIG has already done climate change work relating to the City of Portland, the Tualatin Basin, and the Snake River Basin (which includes Oregon rivers such as the Power system). The USGS, also, has completed some climate change work in Oregon (i.e. Deschutes River). In addition to these "data" driven studies, there are also policy documents that are relevant to the Integrated Water Resources Strategy, such as "Preparing Oregon's Fish, Wildlife, and Habitats for Future Climate Change: A Guide for State Adaptation Efforts" by the Subcommittee on Fish, Wildlife, and Habitat Adaptation, Oregon Global Warming Commission. These should be mentioned here.

A description of the Climate Change Policy recently adopted by the WRC should be included in this section.

- Key Challenges, pg. 33

Included in this section should be a bullet point on "water management" in the face of climate change. While the concept of adaptation is discussed briefly under "Objective Stakeholder Involvement", water management (and the need to adapt it to climate changes) is a looming issue for the state and should be called out here with its own bullet point.

- Key Challenges, Objective Stakeholder Involvement, pg 34

We do not agree that solutions should focus on "no or low" regret solutions. This was the strategy of the Water Subcommittee of the Natural Resources Subcommittee on Global Warming. While previous work under the "no or low" regret solutions resulted in a few general suggestions that might be helpful to the state, the recommendations were not robust enough to adequately adapt water resources management to the challenges that will likely emerge with the Oregon's changing climate.

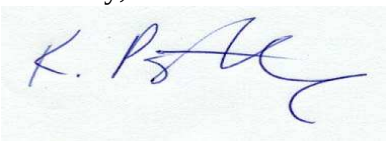
- Conclusion, pg. 34

Again, we do not agree that the state should limit itself to "low or no regret" strategies. This state should instead strive to develop an adaptation strategy that will address the many challenges of climate change head on. Some will likely be controversial, but the state should not avoid tackling these topics altogether by declaring they will be follow a "no or low regret" strategy.

The conclusion also states that the WRC should review and update its recently adopted policy statement of 2/25/2009. It is unclear what information this recommendation is based upon, nor why the WRC would need to do this.

Conclusion: As noted, WaterWatch is very supportive of the state's efforts to develop an Integrated Water Resources Strategy. We appreciate the opportunity to comment on these draft issue papers, and are happy to answer any questions with regards to our comments/suggestions.

Sincerely,



Kimberley Priestley
Assistant Director

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Preliminary Workplan Comments

Integrated Water Resources Strategy

League of Women Voters of Oregon
Marge Easley and Peggy Lynch
September 9, 2009 (email)

LEAGUE OF WOMEN VOTERS®
OF OREGON

Water Resources Commission
725 Summer Street NE, Suite A
Salem, OR 97301-1271

Re: Work Session Item E, Integrated Water Resources Strategy

Members of the Water Resources Commission:

The League of Women Voters is a grassroots nonpartisan, political organization that encourages informed and active participation in government. The League has long followed issues surrounding water and has adopted positions related to water quality (1969) and water policy and planning (1985), both of which are being restudied for update this next year. We supported HB 3369 (2009) related to a long-term integrated water resources strategy for Oregon.

Members of our study committee have reviewed the documents issued under Work Session Item E and have the following comments to share:

1) We realize that the work done so far has been mostly through the volunteer efforts of Water Resources Commission members prior to the addition of or participation by the Department of Environmental Quality, Oregon Fish and Wildlife and other agencies. We commend this work but wonder if it might be advantageous to have at least one member of the Commissions or Boards for these agencies on your Planning Committee in the future.
2) We note that the Legislature provided only staffing dollars for two positions. However, unless the public is actively engaged in this effort, it will fail. We encourage your use of local governments and water partners to help reach out to the general public, since they will be asked at some point to fund the recommendations from your important work. Your flow chart indicates "public participation opportunities," but the dialogue only mentions your three more formal advisory groups. The Project Team seems to be responsible for "filtering" information from all sources. Somehow your process must include a clear, formal way for the Commission to receive direct general public input.
3) Although we were disappointed in the public outreach of the Big Look Task Force, one area where they provided helpful and easily accessible information to the public was through their easily found "Big Look" website. We encourage you to seek additional funding during the February 2010 session to assure that Oregonians can easily find the work on this strategy and can provide input into your important work. That funding

might include staffing to keep the website current with meeting minutes and draft reports, and clerical staffing to manage the many meetings noted in your work plan to complete this important work. In the meantime, web access to the names of members of your Agency Advisory Group, Policy Advisory Group, and any Technical Advisory Groups would be a good first step. Then, in 2011, funding for robust public involvement would be necessary. Interactive displays at local community events and other innovative processes will be needed.

4) We hope you have seen the most recent work of the California Water Resources Department. The 2009 update reports are comprehensive, yet almost overwhelming. Only if other agencies, as mentioned in HB 3369, take on a part of the task could Oregon successfully complete such a broad planning effort (http://www.waterplan.water.ca.gov/cwpu2009/index.cfm). Examples of where your current document does not include the broad issues involved are in Appendix B that lists mostly data sets easily available to the Water Resources Department. We hope your Advisory and Technical Groups will provide you with an expanded list of available data sets from the various agencies' work to assure a complete discussion of the complex issues surrounding water.

Thank you for considering our comments. The League plans on publishing Part 2 of our Water Study in the spring. Members have been conducting interviews with a variety of people in order to provide a statewide view of water issues. Many of our local Leagues have done an informational study of their local water issues. Also, many Leagues have provided a variety of programs for members and local citizens on water issues. Upon receipt of Part 2, they will be asked to consider updates to our positions. Water and climate change are two priority natural resource issues before our members.

We wish you well in your work and offer our support and assistance as appropriate.

Sincerely,

Marge Easley
President

Peggy Lynch
Natural Resources Coordinator

Cc: Michael Carrier, Governor's Natural Resources Policy Advisor
Sen. Jackie Dingfelder, Chair of the Senate and Environment Committee
Rep. Ben Cannon, Chair of the House Environment and Water Committee
Rep. Jefferson Smith and Rep. Bob Jenson, Principle Authors of HB 3369

Sent by:
Rebecca Smith
Executive Administrator
League of Women Voters of Oregon and
League of Women Voters of Oregon Education Fund

League of Women Voters of Oregon
Peggy Lynch
October 2, 2009 (email)

Will you be able to get a shorter URL for people wanting to find the strategy? Right now you have to go through a number of "clicks" on your main website to get to the information. Again, that was a positive with the Big Look.....you could send people to biglook.org whenever you shared the issue with anyone. P

Peggy Lynch, Natural Resources Coordinator for the Action Committee
League of Women Voters of Oregon
946 NW Circle Blvd, #291
Corvallis, OR 97330
541-745-1025
ZULUDAR@aol.com

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WATERWATCH

PROTECTING NATURAL FLOWS IN OREGON RIVERS

October 30, 2009

Brenda Bateman,
Senior Policy Coordinator
Water Resources Department
725 Summer Street NE, Suite "A"
Salem, OR 97301-1271

Re: Comments, Draft Preliminary Work Plan for Oregon's Integrated Water Resources Strategy

Dear Ms. Bateman,

Thank you for the opportunity to comment on the draft Preliminary Work Plan that was developed as part of the State of Oregon's Integrated Water Resources Strategy planning effort.

WaterWatch is very much in support of the development of a State Water Resources Strategy. We actively supported the passage of the legislation that is allowing this effort to move forward. During legislative discussions the WRD represented that this effort was designed to build upon the State's existing statutory authority to develop a forward looking integrated water resources strategy that would be designed to meet Oregon's water needs—both instream and out-of-stream. See e.g. Testimony of Phillip C. Ward, Director, WRD and Dick Pedersen, Director DEQ on SB 193 before the Senate Environment and Natural Resources Department, 2/10/09. In his testimony, Director Ward states that the components of the strategy include: objectives; actions to achieve objectives; adaptation plans related to climate change; an assessment of additional factors such as population growth or land-use changes; and public policy options and recommendations. Id. As articulated by Director Ward, "[v]ery few states have developed a truly integrated water resource strategy of the kind now envisioned for Oregon, to help meet needs for water instream an out-of-stream, above ground and below ground, now and in the future." Id.

According to the WRC's Initial Issue Paper framing the intent of the overall strategy, "[a]n integrated strategy would provide a blueprint for the state to follow as it prepares to meet Oregon's water needs: instream and out-of-stream; above and below ground; now and in the future." See Draft, Oregon Integrated Water Resources Strategy Issue Papers, Introduction: The Need for an Integrated Water Resources Strategy, 9/10/09, WRD, at pg. 5.

The newly passed statutory authority in fact mandates this type of strategy---a "blueprint" that is designed to meet Oregon's instream and out-of-stream needs. HB 3369 states that the WRD shall develop a strategy to implement ORS 536.220(2), which calls for the state to formulate a coordinated, integrated state water resources policy and provide means for its enforcement, that plans and programs for the development and enlargement of the water resources of this state be devised and promoted and that other activities designed to encourage, promote and secure the maximum beneficial use…" ORS 536.220(3). HB 3369 further clarifies the mandates of section (2) by stating that the WRD "shall design the strategy to meet Oregon's

Main Office: 213 SW ASH SUITE 208 PORTLAND, OR 97204 TEL: 503-295-4039 FAX: 503-295-2791 Visit us at:
Field Office: 27 NORTH IVY STREET MEDFORD, OR TEL: 541-772-6116 FAX: 541-779-0791
www.waterwatch.org

in-stream and out-of-stream water needs." ORS 536.220(3)(a). Additionally, HB 3369 directs WRD, in consultation with DEQ and ODFW, to develop objectives, and actions designed to meet these objectives under the strategy. Id. at (d)(A)-(B). The plan must also deliver public policy options and recommendations. Id. at (d)(G).

With that as a background, WaterWatch is very concerned with provisions of the draft Preliminary Work Plan that appear to back away from the development of a truly integrated strategy designed to meet the many challenges this state is, and will, face in meeting existing and future instream and out-of-stream water needs. Rather than striving to build a "blueprint" for the state to follow, the work plan sets up a planning process that appears more about building a "toolbox" that will be available to local communities to use if they so choose (or not) as they search for more water.

Our specific concerns and recommendations are outlined below. Comments correspond with numbering as set forth in the Preliminary 2009-2012Work Plan.

B. Defining a Statewide Integrated Water Resources Strategy, pg. 2

- **Working definition of "statewide" (pg. 2):** this section states that the focus during 2009-2012 will be on the development of tools that the state can make available to local communities for their use. This is too narrow. As noted above, the HB 3369 directs the WRD to develop, in consultation with DEQ and ODFW an integrated water resources strategy to meet Oregon's instream and out-of-stream water needs. As part of this planning effort, the WRD is charged, among other things, with developing objectives, actions to achieve the objectives, and public policy options and recommendations. In addition to these planning provisions, the statute recognizes the ongoing importance of data collection by calling upon WRD, in consultation with DEQ and ODFW, to develop data on an ongoing basis to forecast Oregon's instream and out-of-stream water needs. ORS 536.220(3)(c). Neither HB 3369, nor the focus of the already existing statutory authority (ORS 536.220), directs the WRD to develop a "toolbox" for communities. And while it might be entirely appropriate to include a "toolbox" as one component of a larger plan, this cannot and should not be passed off as any sort of "plan".

  Given this, this section as is should be deleted. The statutes are clear that this must be a "state" plan to be developed, implemented and enforced by WRD. ORS 536.220(2)(a), 3(a). Beyond that, we believe that there is some leeway within the definition of "state". For instance, the state could develop a "one-size" fits all strategy that the WRD would apply to all eighteen river basins uniformly, or on the other hand, it could develop an umbrella strategy with distinct provisions for different river basins to address the variations by basin (i.e. the water pressures facing the Deschutes are not necessarily those that face the mid-coast).

  Given there will likely policy discussions on this point, it is premature to put out a working definition that varies at all from the statute.

- **Working definition of "integrated" (pg. 2):** This section states that integrated means taking into consideration water quantity, water quality and ecological needs during the formation of water resource policy and scientific work. While the WRD might have intended for this to carry over to the actual strategy as well, it is unclear from this language. We suggest clarification so it is clear that the final strategy contains this integration. Also, the term "taken into consideration" seems a bit vague. We would suggest that this term be substituted with "will address".

- **A state-wide integrated water resources strategy should (pg. 2):** This section should be reworked to include the statutory mandates. These include developing objectives, actions to achieve objectives, public policy recommendations, climate change adaptation provisions, etcetera.

- **Intention (pg. 2):** This section states that the intention is to develop framework, data, tools, and resources that communities can use to address their water resources needs within Oregon's statutory authority. It then goes on to say that the intention is not to overhaul Oregon water quality/quantity law, nor to lay out a plan that reallocates water.

  As noted above, the governing statutes call upon WRD to develop an integrated state water resources strategy. There are a number of statutory provisions that apply to that strategy—the overarching one being that it is a plan to help the state meet Oregon's instream and out-of-stream water needs. The direction under the "intention" section to simply put together tools for communities to use to address their water resources needs does not fit within the statutory construct, or the intent as represented to the legislature. At a minimum, this section should mimic the intention as captured by the statutory language. If the WRD wants to add to that "optional" provisions, such as creating a toolbox for local communities that is fine. But it cannot omit the provisions of the plan that are mandated by statute.

C. Information Flow Chart (pg. 3):

- **ODFW and DEQ Coordination:** While this document discusses the agency advisory group, the document needs to lay out the path of coordination between WRD and DEQ and ODFW. DEQ and ODFW are included in the "diagram" as members of the project team, yet the narrative does not describe ODFW's and DEQ's role in the project team. The statute is very clear that the WRD must work in close coordination with these two agencies specifically, thus the document should to lay out the pathway to meet the following mandates:

  - The WRD shall work in close cooperation with DEQ and ODFW to develop the integrated state water resources strategy, in consultation with other state, local, and federal agencies, with other states, with Indian tribes, with stakeholders and with the public.
  - The WRD, in close cooperation with DEQ and ODFW, shall develop data on an ongoing basis for forecast Oregon's instream and out-of-stream water needs.

D. Project Timeline: Phases I-V (pg. 4)

Phase 1: Setting the Stage (pg. 4)

- **1.1 Write and edit issue papers:** this section states that the issue papers will be presented to the members of the three advisory groups for their use in discussion. Comments to these papers should also be shared with the Advisory Groups.

Phase II: Identifying Water Resource Needs (pg. 6)

- This section should be clarified. The strategy as we understand it is to help the state meet current and future needs. Necessarily included in that are management strategies, enforcement, groundwater/surface water interaction, etc. Also, importantly, there will need to be extensive discussions on the "integration" of water quality and ecological needs into the discussion. There will necessarily be many data gaps as well, which should be identified.

  We suggest that this section be expanded to convey the broad spectrum of issues out there that play into meeting Oregon's water needs (instream and out-of-stream) now and into the future.

Phase III: Developing a Toolbox (pg. 6)

- As noted throughout, we do not believe that developing a "toolbox" meets the statutory directives governing this process. This section should be re-titled to "developing an integrated water resources strategy".

Phase IV: Producing the First Edition of the Strategy and Recommendations (pg. 6): It appears from reading the document as a whole, as well as this section specifically, that the WRD intends to release various "editions" of the strategy, with the first edition focusing largely on a "toolbox". As noted, we do not think the "toolbox" approach meets the intent or the statutory mandates of the governing legislation.

That said, we do understand that the WRD did not receive full funding requested for this effort. Under funding, understandably, makes the planning process that much more challenging. However, we do not believe that a funding shortfall should provide rationale for producing a document that does not embody a true strategy. Thus, we would recommend that the WRD not strive to produce a "first edition" that only captures one aspect of the overall plan (i.e. the "tools").

The WRD is not under a mandate to complete the study by 2012, rather it only has a duty to report to the legislature on progress and whether it expects to complete the strategy by 2012. If funds are not sufficient to develop a study to the extent envisioned, we think the better course would be for the state to update the legislature on progress to date and ask for more funds. Given the wide spectrum of stakeholder support of this effort, we anticipate that support for more funding would be a concept that would gain wide support.

Technical and Policy Content of the 2009-2011 Integrated Water Resources Strategy (p. 6):

Requirements as per HB 3369(2009) (pg. 6): We appreciate the inclusion of this section. However, as noted previously, the document as a whole doesn't appear to envision a strategy that addresses these many components. As noted throughout, we would recommend that the work plan be reworked to revolve around these statutory mandates rather than the building of a "toolbox" for communities to use.

Optional (pg. 6): We are concerned about the inclusion of the assessment of "basin yield" in this section. Assessment of "basin yield" absent a corresponding and interconnected assessment of "peak and ecological flows" will result in inflated expectations about the amount of water that is "available" for supply development in any given basin. WaterWatch made this argument in the 2007 session in front of the Legislature when funds for basin yield assessments were requested by WRD under the OWSCI process. The 2007 Legislature did not fund this assessment under OWSCI. Funds dedicated to the development of this strategy under HB 3369 should not be used to fund this work either, especially if there is no corresponding work to assess peak and ecological flows.

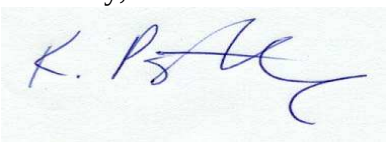
WRD is tasked with closely coordinating with ODFW and DEQ on developing this strategy, as well as developing ongoing data on Oregon's water needs. We suggest that WRD coordinate with these agencies on this section, especially as they will have the best understanding of what water quality and ecosystem needs that should be addressed/included.

Appendix A: Statutory Authority (pg. 8)

Included in this section should be ORS 536.220(2) as HB 3369 specifically calls out this section as the integrated policy that the strategy is supposed to implement.

Conclusion: As noted, WaterWatch is very supportive of the state's efforts to develop an Integrated Water Resources Strategy. That said, we urge the WRC and WRD to adjust this work plan to better reflect the directives and intent of the statutory mandates. Thank you for this opportunity to comment.

Sincerely,



Kimberley Priestley
Assistant Director

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Online Survey Responses

Integrated Water Resources Strategy

Wade Peerman (Citizen)
October 2, 2009

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1. Describe the organization you represent and its interest in an Integrated Water Resources Strategy for Oregon.

> I am employed by the Oregon DEQ as a groundwater monitoring specialist and interested in the water quality monitoring aspects of an IWRS.

2. We are seeking the widest possible input on this strategy from all interested parties throughout the State. How do you think we can best do this?

> A difficult task to begin with, but by offing a transparent and open environment for discussion is one way to encourage the participation of all interested parties.

3. Are there particular approaches that you have used or seen in planning processes that we should use as well? (e.g., use of a SWOT strength-weakness-opportunities-threats assessment, or other specific process). Which, in your view, are processes that work well and which are not?

> SOLV, a non-profit agency used focus groups from around the state to guide their planning process for future work. Participation in the group was voluntary and ensured a voice for those interested in the future of the organization as a whole. This information was collected by an outside third-party and was compiled for the SOLV Board of Directors to discuss at a goal-oriented retreat to determine the future of the organization. I believe the project outline for the IWRS contains this and look forward to participating myself as well as the final result.

4. How formal should this process be, in terms of advisory or technical groups?

> I think that there is room for both formal technical groups and informal information sessions where the public perception and interest can be understood. It is imperative to bridge the gap between the science behind the strategy and the actual implementation of projects that would have an effect on water resources in the state.

5. What do you think about piggybacking this process onto already existing events, activities, or opportunities? For instance, when is your annual organization or association meeting and could a water resources discussion with interested members be held in conjunction with the event?

> I think this is a viable alternative, especially if funding is limited for this project.

6. What are your main concerns about the process of water resource planning, or are there potential obstacles/deal breakers we should keep in mind?

> My main concern is that the public will be left out of the decision making process and that the detailed understanding that each agency involved in the process will be lost among the public. I fear also that the interconnectedness of water resources to other parts of our daily life will be lost.

7. Would the organization that you represent be willing to participate in the planning and development process of Oregon's Integrated Water Resources Strategy? In what way?

> I would be willing to participate on an individual level. However, I would need to further discuss any opportunities to contribute with my manager.

Benton County
Adam Stebbins
May 11, 2009

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1. Describe the organization you represent and its interest in an Integrated Water Resources Strategy for Oregon.

Benton County, Oregon.

Interest in developing cross-jurisdictional water planning and policy within the upper Willamette basin, serving as a template to counties and regions throughout the entire Willamette Basin.

2. We are seeking the widest possible input on this strategy from all interested parties throughout the State. How do you think we can best do this?

Provide funding to currently active counties to engage local residents by bringing together diverse stakeholders including Watershed Councils, Cities, SWCDs, and other residents with diverse interests.

OWRD should work with counties to standardize multiple choice and open-ended questions that focus on the local/regional issues.

OWRD in consultation with others could then 'roll up' the input to the state level to develop a vision and specify the priority local and regional components to be incorporated into the statewide plan.

3. Are there particular approaches that you have used or seen in planning processes that we should use as well? (e.g., use of a SWOT strength-weakness-opportunities-threats assessment, or other specific process). Which, in your view, are processes that work well and which are not?

Countywide community meetings facilitated via a collaboration with diverse local stakeholders(government staff, councils, swcd, etc.)

Use of Qwizdom Tools TM and surveys to gain data baselines for questions formed.

Provide a synthesis of locally derived data completed, combine with other local data, to produce a larger region input analysis.

4. How formal should this process be, in terms of advisory or technical groups?

Develop a project Steering Committee composed of decision makers such as: Water Resources (3) commissioners, DEQ Commission (3), Association of Counties/Cities presidents, Governor appointee(s). 10-15 total. Meet monthly and produce updates routinely. Base group input on who attends/participates.

Use of existing technical groups to vet scientific data needs, but with interdisciplinary work focus, such as: Climate Change Impacts Group, OSU-Institute for Water and Watersheds, and others. 5-10 people total.

5. What do you think about piggybacking this process onto already existing events, activities, or opportunities? For instance, when is your annual organization or association meeting and could a water resources discussion with interested members be held in conjunction with the event?

This is a necessary step to spread information.

County Fairs.

Providing information to County staff to provide to the public when and where appropriate and most effective.

6. What are your main concerns about the process of water resource planning, or are there potential obstacles/deal breakers we should keep in mind?

Too limited public input.

Too heavy on a single issue.

Should not be driven by collecting new data.

Lack of integrating complex water issues--could be overcome through acknowledgement of adopting information as available and needed by the steering and technical teams.

"Painting the correct picture" for western Oregon, where a majority of water users are unaware of the complex issues.

1. Lack of adherence to basin plans
2. Conflict over complexity with 100 years of water law, ORS, and OAR making progress for planning difficult

7. Would the organization that you represent be willing to participate in the planning and development process of Oregon's Integrated Water Resources Strategy? In what way?

Yes.

Local/regional meetings and collaborative facilitation of meetings to gain public input.

Findings from the regional planning efforts lead by Benton County in the Lane, Linn, Benton County (upper Willamette sub basin)---input from Commissioners and technical experts perspectives.

Clean Water Services
Charles Logue
October 2, 2009

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1. Describe the organization you represent and its interest in an Integrated Water Resources Strategy for Oregon.

> Clean Water Services, a public wastewater and stormwater utility serving the urban areas of Washington County, OR. CWS has long been an advocate and supporter of IWRM approaches. We a deeply interested in a comprehensive, integrated water resource management approach as exhibited by our watershed-based NPDES permit and our investment in the Hagg Lake reservoir where we own 1/4 of the stored water a release it for water quality purposes.

2. We are seeking the widest possible input on this strategy from all interested parties throughout the State. How do you think we can best do this?

> Continue with the approach you have taken to date

3. Are there particular approaches that you have used or seen in planning processes that we should use as well? (e.g., use of a SWOT strength-weakness-opportunities-threats assessment, or other specific process). Which, in your view, are processes that work well and which are not? I think you need to tailor the approach to the specific issues.

> I don't have a favorite.

4. How formal should this process be, in terms of advisory or technical groups?

> A formal process greatly assists with a transparent format and framework. I like the use of Advisory groups and Technical groups.

5. What do you think about piggybacking this process onto already existing events, activities, or opportunities? For instance, when is your annual organization or association meeting and could a water resources discussion with interested members be held in conjunction with the event?

> Yes!

6. What are your main concerns about the process of water resource planning, or are there potential obstacles/deal breakers we should keep in mind?

> That it will be biased to the current regulatory frameworks and constraints. Needs to be innovative!

7. Would the organization that you represent be willing to participate in the planning and development process of Oregon's Integrated Water Resources Strategy? In what way?

> Yes. Hosting an event. Reviewing and commenting on issue papers.

Deschutes River Conservancy
Scott McCaulou
September 17, 2009

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1. Describe the organization you represent and its interest in an Integrated Water Resources Strategy for Oregon.

> The Deschutes River Conservancy is a non-profit organization based in Bend with a mission to restore streamflows and water quality throughout the Deschutes Basin. Integrated water management is vital to maintaining and restoring instream flows as competition between various water interests increases.

2. We are seeking the widest possible input on this strategy from all interested parties throughout the State. How do you think we can best do this?

> Creating geographically focused stakeholder working groups to inform the broader process. Basin-scale participation (rather than regional) would be optimal.

3. Are there particular approaches that you have used or seen in planning processes that we should use as well? (e.g., use of a SWOT strength-weakness-opportunities-threats assessment, or other specific process). Which, in your view, are processes that work well and which are not?

4. How formal should this process be, in terms of advisory or technical groups?

> The process should be designed to encourage as much citizen involvement as possible. This would suggest a more informal process.

5. What do you think about piggybacking this process onto already existing events, activities, or opportunities? For instance, when is your annual organization or association meeting and could a water resources discussion with interested members be held in conjunction with the event?

> To some extent, this may be possible.

6. What are your main concerns about the process of water resource planning, or are there potential obstacles/deal breakers we should keep in mind?

7. Would the organization that you represent be willing to participate in the planning and development process of Oregon's Integrated Water Resources Strategy? In what way?

> Yes.

Integrated Water Solutions, LLC.
Terry Buchholz
September 1, 2009

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1. Describe the organization you represent and its interest in an Integrated Water Resources Strategy for Oregon.

> I am the principal for Integrated Water Solutions, LLC. Integrated Water Solutions,LLC is a newly created women-owned, small business that specializes in providing strategic, process driven thinking for water resources and environmental projects. With over 26 years of experience, Integrated Water Solutions LLC brings expansive knowledge of the water resources and regulatory issues that face Oregon and the Pacific Northwest.

2. We are seeking the widest possible input on this strategy from all interested parties throughout the State. How do you think we can best do this?

> Build on what was learned at the Water Roundtables. Don't repeat them.

3. Are there particular approaches that you have used or seen in planning processes that we should use as well? (e.g., use of a SWOT strength-weakness-opportunities-threats assessment, or other specific process). Which, in your view, are processes that work well and which are not?

> The is having this process driven and not technically driven. A funnel approach, where you start at with a broad understanding (information from the roundtables) and at the end of the funnel focusing on a framework that can be tailored and implemented in each larger basin.

4. How formal should this process be, in terms of advisory or technical groups?

> A tiered approach would probably work best, having both a policy and technical tier.

5. What do you think about piggybacking this process onto already existing events, activities, or opportunities? For instance, when is your annual organization or association meeting and could a water resources discussion with interested members be held in conjunction with the event?

> I think you can do this as long as you do not significantly change the process or format from event to event.

6. What are your main concerns about the process of water resource planning, or are there potential obstacles/deal breakers we should keep in mind?

> The main concern or obstacle would be to build a collaborative process that accounts for stakeholders needs, but doesn't cater to a couple strong (bully) lobbyist. Stakeholder involvement needs to cover all interests, but the representatives need to be people that can work collaboratively and are truly interested in finding an integrated solution.

7. Would the organization that you represent be willing to participate in the planning and development process of Oregon’s Integrated Water Resources Strategy? In what way?

> I would like to work with OWRD and the WRC to design and facilitate the framework and process.

League of Women Voters of Oregon
Marge Easley, President
February 18, 2009

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1. Describe the organization you represent and its interest in an Integrated Water Resources Strategy for Oregon.

The League of Women Voters of Oregon is a grassroots nonpartisan, political organization that encourages informed and active participation in government. The LWVOR has long been interested in Oregon water issues. We have positions related to water policy and planning and water quality, most important of which is "…all water policy should be managed for the benefit of the public."

Our membership believes water issues are so important that they approved a new study of water issues in 2007. We have spent the last 18 months learning about Oregon's water laws and any federal laws that connect with this issue. The report was released in February. A second part of the study scheduled for completion in 2010, will look in depth at current water issues. Local Leagues will be reviewing what was learned, reviewing our current positions and determining if changes should be made. Perhaps the biggest and most obvious issue identified to date in the LWVOR study is that there are a myriad of agencies, statutes and rules governing water quality and quantity, yet each agency addresses their individual responsibility without a comprehensive state strategy in place.

The League is pleased to see the development of an Integrated Water Resource Strategy for Oregon and is interested in participating and working to provide informed public participation.

2. We are seeking the widest possible input on this strategy from all interested parties throughout the State. How do you think we can best do this?

LWVOR recognizes Oregon has a vast network of water related organizations that should be involved in gathering input. However, the general public, not directly involved in or familiar with water related issues, needs to be incorporated in the outreach. Using platforms such the LWV, Granges, information in utility bills, municipality publications, sporting clubs, Rotary, and other public service organizations will bring in members of the general public who might not otherwise be aware of the urgency and complexity of the issue. Computer tools such as PowerPoint, websites, and e-mail links that are readily available would make this process easier. Important in this process is presenting an interesting story that involves the general public by providing an appropriate level of excitement and challenge.

3. Are there particular approaches that you have used or seen in planning processes that we should use as well? (e.g., use of a SWOT strength-weakness-opportunities-threats assessment, or other specific process). Which, in your view, are processes that work well and which are not?

Recognizing that stakeholders may enter this process with preconceived biases and impressions, care must be taken to use processes that will not initially alienate participants and will encourage acceptance of compromise and change. Since most approaches vary in their effectiveness depending on the characteristics of the planning group, identifying or recommending approaches is difficult.

The LWVOR would suggest that the process might be best assisted by utilizing the talents and experience of existing organizations such as Sea Grant, Extension and the Council of Governments that have a recognized track record providing non-biased facilitation of plan development and the technical expertise to ensure "translation" of data and issues to maximize task force understanding.

4. How formal should this process be, in terms of advisory or technical groups?

The process will vary. If the issue involves policy development, the more debate allowed the better. For technical groups which are less advocacy and more informational, presentations and responses will likely be different. The "formality" of groups must not inhibit public participation and should be as interactive as is possible. No resolution of conflict is ever solved with a top-down approach.

Good scientific data will require the development of a strong technical science advisory group. This group will, by nature, be organized and must be extremely knowledgeable. Such a group may require a peer review process.

Because the process requires the integration of federal and state laws, statutes and regulations, an advisory group with knowledge and understanding of the legal implications of both state and federal laws will be essential. The legal advisory group must have the capacity to integrate successfully with the scientific advisory group

These formal technical and advisory groups will provide accurate support to be integrated in to a less formal process of feedback from the diverse stakeholder groups.

5. What do you think about piggybacking this process onto already existing events, activities, or opportunities? For instance, when is your annual organization or association meeting and could a water resources discussion with interested members be held in conjunction with the event?

Without question this is one of the best and most effective approaches. However, presentations for varying groups need to be structured in a manner that is non-threatening and using just one approach is not feasible, and this approach cannot satisfy the need to reach all members of the public.

The LWVOR usually has an annual meeting in the spring and would be pleased to sponsor a presentation. In addition many local leagues are also seeking presenters.

6. What are your main concerns about the process of water resource planning, or are there potential obstacles/deal breakers we should keep in mind?

As stated previously there are a myriad of agencies, statutes and rules governing water quality and quantity, yet each agency addresses their individual responsibility without a comprehensive state strategy in place. There needs to be an evaluation process included in the strategy to determine the effectiveness of current and future regulation in actual practice and identify conflict created as the result of the different approaches of agencies in regulating water.

The LWVOR believes that all water policy should be for the benefit of the public, which requires establishing a balance between the needs of in-stream and out-of stream uses, between domestic, agriculture and industrial uses, while protecting of the quality of water and planning wisely for the future. To establish the appropriate balance, the economic and cultural history of our state must be challenged and changes made. In order for the process to be successful all involved must be willing to make difficult decisions. If this effort is to succeed these decisions must be made and there must be "buy-in" from all water users that is all citizens of the State.

7. Would the organization that you represent be willing to participate in the planning and development process of Oregon's Integrated Water Resources Strategy? In what way?

LWVOR is extremely interested in participating in the process. The League would like to provide a representative to serve on the statewide task force. The LWVOR is willing to facilitate meetings and will encourage local Leagues to become involved. The recognized knowledge, integrity, and non-partisan position of the Oregon League of Women Voters could be a valuable asset in developing this essential strategy and assisting with public outreach.

Oregon Association of Water Utilities
Jason Green
February 2, 2009

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1. Describe the organization you represent and its interest in an Integrated Water Resources Strategy for Oregon.

> Oregon Association of Water Utilities is interested in supporting and being involved with/in utilities' and cities' "best interests" in all future aspects of water resource strategy that stems or is founded on common sense, practical law and plans that promotes fair and realistic strategies for the future (keeping in mind there are other interests also).

2. We are seeking the widest possible input on this strategy from all interested parties throughout the State. How do you think we can best do this?

> Call for interest using avenues established and reasonable.

3. Are there particular approaches that you have used or seen in planning processes that we should use as well? (e.g., use of a SWOT strength-weakness-opportunities-threats assessment, or other specific process). Which, in your view, are processes that work well and which are not?

> the approaches relate to people and work only as well as the core people or leader assigned in most cases. additionally, there are those who will not comply or be receptive to any approach.

4. How formal should this process be, in terms of advisory or technical groups?

> I am not aware of the pro/cons completely to comment. there are strengths and weaknesses in each.

5. What do you think about piggybacking this process onto already existing events, activities, or opportunities? For instance, when is your annual organization or association meeting and could a water resources discussion with interested members be held in conjunction with the event?

> I believe this is wise to take advantage of existing events/groups. OAWU would welcome this.

6. What are your main concerns about the process of water resource planning, or are there potential obstacles/deal breakers we should keep in mind?

> simply put: politics, power, money and people

7. Would the organization that you represent be willing to participate in the planning and development process of Oregon's Integrated Water Resources Strategy? In what way?

> Yes. any way needed that we can participate in.