



**OREGON
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Formerly Oregon Natural Resources Council (ONRC)

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June 30, 2008

Michael Carrier, Natural Resources Policy Director
Office of the Governor
160 State Capitol
900 Court Street
Salem, Oregon 97301-4047

Re: Comments on the Governor's Headwaters to Ocean Strategy

Dear Mike,

We applaud the Governor's commitment to provide abundant and safe water to the state of Oregon whilst preparing for resource challenges. The "Headwaters to Ocean Initiative" (H2O) provides a chance to build on strong natural resource planning and ethics in the state of Oregon, while anticipating the potential for climatic and regional changes. Oregon Wild appreciates the opportunity to offer comments on the May 2008 Draft H2O initiative.

As one of Oregon's oldest and largest state-based conservation organizations, with a strong role in safeguarding wilderness, in and out of stream water demands, roadless areas, and much more, Oregon Wild values the chance to review the H2O initiative on behalf of its members. While the H2O initiative has the potential to provide a progressive vision for water resource allocation and consumption, we take this comment opportunity to identify a few of our primary concerns with H2O.

Conservation as a priority

At Oregon Wild we maintain that Oregon waters are vital parts of what makes our state a special place to live, work, and raise a family. In keeping with this vision, we find the H2O initiative lacks proper attention to conservation efforts. In order to prepare for an uncertain future, H2O should focus on **conservation as a priority and regulatory necessity**. Though conservation is considered part of the initiative's three-pronged approach to strategy, further specification and consideration of conservation work is not detailed sufficiently in the strategy table of the May 2008 initiative draft.

Given the terrific opportunities for state-wide conservation and regional efficiency improvements, water resource demand research reveals that *if* there is a rise in demands due to population growth or other resource challenges, demand can be largely reduced through conservation measures. It is important for the Governor to make conservation a priority in resource planning, therefore managing demands while adapting for population growth, climate

change, and other water resource challenges. In doing so, the Governor should consider **enforceable conservation regulations** to support the universal idea that water, as a public resource, is to be shared and managed for all needs, giving priority to conservation as a means of resource preservation and protection.

Bias toward supply

The H2O initiative is considerably biased toward supply and storage projects as the largest single budgetary item. Though consideration of and funding for supply projects may be necessary to Oregon's water resource future, data of state-wide demands do not exist to necessitate costly new supply opportunities. The Oregon Water Conservation and Supply Initiative (OWSCI), managed by the Oregon Water Resources Department, is largely responsible for assessing the need for supply based on a statewide water demand inventory and projection. Results from OWSCI have yet to be completed and thoroughly documented. Therefore, the H2O initiative's interest in supply seems premature to a complete assessment of Oregon water demand and supply needs. A proper inventory and forecast of regional demands should be done, reviewed, and published publicly prior to the implementation of new storage projects.

Ecosystem benefits are beneficial uses of water

Under Oregon Law, ecosystem benefits are considered beneficial uses of water. The H2O initiative should be altered to reflect this. Protection of instream uses of water must be given proper consideration and priority in H2O. At present the May 2008 draft initiative does not reflect adequate language or intention to this regard. Instead the document's neglectful language reflects the initiative's failure to give proper attention to instream needs.

Science-based decision making

Just as this applies to demand assessment of OWSCI, reliable resource science research should support the H2O initiative and any related projects. **To this end, credible demand assessment and forecasting, as well as climate change modeling results should be incorporated into the H2O initiative with scientific basis and supportive documentation.** There is no doubt that climate change will have a significant impact on our regional resources in the future. Though climate change science is extraordinarily complicated, the assumption of climate change impacts is simply not enough to justify major H2O supply projects. Therefore, H2O initiative administrators should take care to complete proper research in order for climate change impacts to be scientifically based and factored into planning appropriately.

Budgetary considerations

Given the financial challenges throughout the state's budget, consideration of more conservative funding should be done. That is, less expensive means to resource supply should be considered prior to costly investments in new storage projects. In draft form, the H2O's allocation of funds, particularly to new storage, seems excessive and deserves more attention and justification.

Thank you for your consideration of Oregon Wild's comments. As the H2O initiative progresses, we look forward to additional review opportunities. Oregon Wild supports the Governor's interest in securing abundant and safe water supplies in the face of statewide changes and challenges and would be happy to provide assistance as the initiative develops.

Sincerely,

Steve Pedery
Conservation Director, Oregon Wild