

Thank you for the opportunity to review and comment on the May 2008 draft Headwaters to Ocean (H2O) strategy. As the strategy notes, the challenges of assuring adequate water supply and water quality will take on new urgency in the face of population growth and climate change. Leadership from the Governor's office on these critical issues will be essential as we all work to meet these challenges.

The City of Portland, Bureau of Environmental Services (BES), is providing the following comments on the May 2008 draft H2O strategy.

- We agree with the draft strategy that supporting the efforts of local, private and other key partners is a program area that will be important for successful water resources management. The strategy should also indicate the role of Tribal governments in implementing the strategy, and how the strategy will coordinate with applicable current and future federal requirements.
- The draft strategy identifies population growth as one of the pressures on water resource management in Oregon, however the strategy should also emphasize that urban development can occur in such a way that it can actually improve water quality. In developed areas, properly designed swales, planters, ecoroofs, and other vegetated facilities filter stormwater pollutants, protect water quality and provide habitat. Retrofitting existing development with landscape facilities can infiltrate stormwater into the ground and help protect streams and terrestrial habitats.
- The draft strategy identifies administrative challenges, including assisting local jurisdictions in developing and maintaining critical water infrastructure. While the term "water infrastructure" is not defined, infrastructure systems such as properly operating sewer systems and green infrastructure such as swales and ecoroofs should be considered critical infrastructure components that protect water quality. In addition, while administrative challenges include restoring budget for state resources, the strategy should clarify if "technical assistance for local jurisdictions" also includes financial assistance to implement programs and projects that support the strategy.
- The draft strategy estimates a biennial cost of \$ 2,250,000 for Department of Agriculture for water quality monitoring, compliance, outreach and pesticide management, and \$1,000,000 per biennium to address agricultural water supply issues, invasive aquatic species and coordination of soil and water conservation districts. BES is supportive of providing funds for these critical services to protect water quality and supply.
- The draft strategy identifies the Department of Environmental Quality's (DEQ) role in protecting and enhancing water quality, including reducing discharges of pollutants. The strategy should be clear that this will include a significant focus on non-point sources of pollutants.
- The draft strategy includes balancing beneficial use with ecosystem benefits provided by water bodies. Currently the draft strategy does not list DEQ as providing services in this area. As the strategy is revised, we would encourage that DEQ's expertise in water quality issues, such as conducting human health and ecological health risk assessments be tapped to inform this strategy.

- As the ecosystem benefits portion of the draft strategy is refined, we would encourage committing resources to a process that identifies the ecosystem benefits that can be provided by water bodies, and further defines how these benefits will be monitored and measured.

Again thank you for the opportunity to comment on the draft H2O strategy. If you have any questions, please do not hesitate to call me at 503-823-5313.

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