



March 5, 2023

To House Committee on Agriculture, Land Use, Natural Resources, and Water

From: Oregon Association of Conservation Districts

Re: **HB 3100 Integrated Water Resources Strategy**

Chair Helm and Committee Members,

The Oregon Association of Conservation Districts (OACD) represents Oregon's 45 Soil and Water Conservation Districts (SWCDs), special districts governed by elected boards. The Districts protect and enhance soil quality, water quality and quantity, and habitat by supporting voluntary conservation in partnership with private landowners and managers as well as federal, state, and nonprofit partners.

OACD supports HB 3100 with the exception of creating an additional advisory committee. The Integrated Water Resources Strategy (IWRS) is a good long-range planning tool for Oregon. We believe that the latest edition of the strategy (2017) is a strong document with solid direction and that future editions should be promoted as central documents that set the direction for water planning in the State. However, there is opportunity for improvement.

We support the explicit inclusion of the Oregon Department of Agriculture (ODA) as a key participant in integrated water resource planning. Agriculture has a major impact on the use of our water and can potentially have big impacts on water quality. ODA has a key role in water associated with agricultural operations that needs to be included.

We support retaining the Oregon Department of Water Resources (OWRD) as the lead agency in integrated water resources planning. While OWRD does not have all the important roles and responsibilities for water management in the State, it has a large share and a broad mission focused on water that makes it the logical lead. The Oregon Water Resources Department under the guidance of the Water Resources Commission can continue to successfully take a lead role in development of the IWRS.

OWRD has a strong track record of involving stakeholders in its water planning efforts and has full authority to continue to do so in the future.

We recommend deleting the Integrated Water Resources Strategy Advisory Committee. This committee would add unnecessary bureaucracy. Water management is and will always be very complex and require a multiple disciplinary approach involving a broad range of stakeholders. Various natural resource agencies in Oregon have strong roles to play in managing our water resources, with each agency bringing perspectives and abilities that are founded in their own missions. While it is tempting to think that we could manage our water better by having all responsibility for water consolidated with more centralized oversight, this will not necessarily solve the problems.

There are many good examples of successful coordination between the natural resource agencies, and we largely believe that the agencies truly want to work together for the good of the State. However, there will always be a need to address lack of coordination and problem resolution between agencies. We don't think that the advisory committee is the best solution to coordination and problem resolution. This may best be handled by coordinating mechanisms within the executive branch. Perhaps this can be addressed through HB 3356 if the mechanisms foster support and not competition for the directions set in the IWRS.

We support the explicit inclusion of place-based planning as a key strategy in implementation of the IWRS. Much thought has been given to this approach in recent years and it should continue forward through HB 3163 and the recognition it is given in HB 3100.

We support the development of a biennial work plan. Section 1 paragraph 8 of the bill calls for development of this plan to prioritize and implement actions. This is an important task to keep focus on implementation, particularly with a longer planning cycle for update of the IWRS. Of course, since we are recommending deleting the Integrated Water Resources Advisory Committee from the bill, it should be removed as a named entity from this section of the bill too.

We recommend adding assessment of costs and benefits to the requirements of the IWRS. The current version of the IWRS has little assessment of the costs to fully implement the plan and the relative benefits of each of the actions. Thus, we are left without a solid understanding of how much it will really take to manage our water resources in a way that meets our expectations and needs. We need this information on the true cost of managing our water resources so that we can make informed policy decisions on how much we invest as a State. To the list of items to be included the IWRS we recommend the following addition:

Section 1 (6) (m) Cost estimates for implementation of the IWRS at the State and local levels with an assessment of benefits for various actions that can be used to help prioritize actions and investments.

We support the addition of a biennial report to the legislature on implementation of the IWRS. This is a good mechanism to keep focused on implementation of the plan. As written in HB 3100, this report is to be done by the Water Resources Department. We agree that this should be led by the Water Resources Department, but it should also include the Department of Fish and Wildlife, the Department of Environmental Quality, and the Department of Agriculture. Having these other agencies involved in the report will improve accountability.

We recommend an alternative planning cycle between 5 and 10 years. HB 3100 changes the planning cycle for the IWRS from 5 years to 10 years. We acknowledge that a five-year cycle may be too short given the expectations for stakeholder involvement and can detract from getting the work done. However, 10 years is probably too long as it may lead to lost focus on the plan and will not adequately account for the fast-changing conditions in how we need to manage our water resources. Perhaps 7 or 8 years would be best.

Thank you for the opportunity to provide input.



Stan Dean, Advocacy Committee Chair
Oregon Association of Conservation Districts
stan.dean@jswcd.org