March 14, 2012

Mr. William H. Fujii Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301-1266

RE: Polk County's grant application for 2012-2013 Valsetz Water Storage Concept Analysis

Dear Mr. Fujii,

In lieu of a more prepared document on my home office computer which I cannot access as my home is still without power from the recent storms on the coast, please accept these limited comments in regards to the potential additional funding for a water storage facility in Valsetz area.

In a time in history when science and society continue to show dams are harmful to many types of organisms, specially anadromous fishes, and request current dams be discontinued and decommissioned and new dams rejected, I find it difficult to believe the Oregon Water Resources Department is considering additional funding for a potentially devastating reservoir from a coastal river to satisfy the needs of Willamette valley residents.

As a user of water and forest resources on the coast, fishermen, hunter, gatherer, conservationist, fish biologist and resident of the Siletz area, I strongly urge the Oregon Water Resources Department to deny the request for further funding to study the Valsetz area as a water storage possibility. I believe there are other alternatives that should be explored in the same capacity as the first feasibility study for the Valsetz area before returning to the Valsetz Water Storage Concept.

Thank you,

Aaron Chappell

3082 Old River Road NE Siletz, Oregon 97380 Acc.ichthy@live.com 541-740-9399

From: Andrew Burton <nextrevolutionglassworks@yahoo.com>

**Sent:** Sunday, March 11, 2012 4:16 PM

To: Bill Fujii Subject: Siletz dam...

# Mr. William H. Fujii,

I can't tell you how much this proposed dam concerns me. All across the great state of Oregon dams are being removed for the negative ecological impacts on our threatened salmon and steelhead populations. This study is ill conceived, and this dam would threaten one of the few remaining refuges of wild salmon left in the lower 48. As a resident Oregon, I plan on opposing this vehemently until the issue is put to rest. If you must build another Dam, I have some advice for you. Choose a river with salmon runs that have been decimated already, or one with a heavy hatchery influence. Do not mess with a watershed that still supports a healthy run of wild fish. Oh, and make sure to put some good lawyers on retention, because you will get sued (see Klamath river). This will obviously meet opposition from many people like me. This grant money will be wasted on a dead end idea, and should be put towards a more serious project.

Don't do it,

Andrew Burton

From: Chris Marks < ChrisMarks@ctuir.org>
Sent: Thursday, March 15, 2012 2:19 PM

To: william.h.fujii@state.or.us

**Subject:** WWBWC Aquifer recharge strategy and feasibility study application.

Mr. Fujii,

The Confederated Tribes of the Umatilla Indian Reservation's Natural Resource Department supports State funding for the Walla Walla Basin Watershed Council's Aquifer Recharge Strategy and Feasibility Study proposal. Utilization of high winter and spring flows to augment water supply and stream flows is a growing trend. The CTUIR and basin stakeholders have made tremendous strides in restoring conditions that can sustain a healthy fishery. We believe aquifer recharge and recharge/recovery can play a vital role in restoring stream flow quantity and quality.

Utilization of high winter and spring flows to augment stream flows and consumptive supply is a growing. Without a plan in place, we fear those efforts could result in the same overappropriation issues that plague other seasons. While we understand there are unanswered quantity and regulatory questions in the application, we believe it is important to start defining the opportunities and begin investigating their potential.

Please contact Chris Marks at <u>541.429.7213</u> or <u>chrismarks@ctuir.org</u> with any questions.

Thank you,

Chris Marks Water Rights Policy Analyst

Sent from my Verizon Wireless Droid

Water Resources Commission Agenda Item C Attachment 2 - Page 9



March 15, 2012

Oregon Water Resources Department Water Conservation and Supply Program – 1069 grants Water Resources Department 725 Summer St. NE, Suite A Salem, OR 97301-1271

Re: General and Specific Comments, WRD Water Conservation and Supply Program Recommendations

Dear OWRD,

Thank you for the opportunity to comment on the Water Conservation and Supply Program recommendations for funding. WaterWatch worked with a number of interests in drafting the governing law (SB 1069), as well as serving on the Rules Advisory Committee that the WRD convened to help draft the rules. With that background, we are offering the following general and specific comments on the WRD's recommendations.

#### **General Comments**

#### 1. A number of the storage projects that are recommended for funding do not comply with the underlying law.

WaterWatch continues to be concerned that a number of grant applications are not complying with the underlying law on these grants. SB 1069 has a very clear threshold standard for storage projects. If a proposed storage project, including ASR, will impound surface water on a perennial stream, divert water from a stream that supports sensitive, threatened or endangered fish or divert more than 500 acre-feet of surface water annually, a grant may only be provided if the proposed study contains:

- (a) Analyses of by-pass, optimum peak, flushing and other ecological flows of the affected stream and the impact of the storage project on those flows;
- (b) Comparative analyses of alternative means of supplying water water, including but not limited to the costs and benefits of conservation and efficiency alternatives and the extent to which long-term water supply needs may be met using those alternatives;
- (c) Analyses of environmental harm or impacts from the proposed storage project;
- (d) Evaluation of the need for and feasibility of using stored water to augment in-stream flows to conserve, maintain and enhance aquatic life, fish life and any other ecological values; <u>and</u>
- (e) For a proposed storage project that is for municipal use, analysis of local and regional water demand and the proposed storage project's relationship to existing and planned water supply projects.

The rules reiterate this standard in OAR 690-600-0020(4)(f), which is the "application requirement" section, making it clear, again, that for proposed storage projects that meet the trigger noted above, the listed studies <u>must</u> be part of the funded proposal. In other words, if these studies are not part of the proposal as outlined in the application, then the WRD cannot fund the proposal.

While this threshold for funding is clear both in the statute and the rules, and the application for that matter, it appears that a number of applications that the WRD has recommended funding for do not meet this standard (at least by virtue of the information provided in the applications posted on-line). Included, but not limited in this list are:

- a. Lincoln/Polk County, Valsetz Dam
- b. East Valley Water District, Drift Creek Storage

Main Office: 213 SW ASH SUITE 208 PORTLAND, OR 97204 TEL: 503-295-4039 FAX: 503-295-2791

Because the applications fail to meet the threshold standard of consideration, they should not be considered for funding.

# 2. As part of its proposal review, the WRD and the reviewing agencies should do a rudimentary review of the proposals to ensure that the proposed project would be in compliance with existing laws, and also that the applicant is currently meeting current permit conditions.

It is unclear to what extent the reviewing agencies are doing any independent review of the applications beyond assessing the answers provided by the applicant. For instance,

- Is the WRD doing an independent water availability analysis on streams where applicants are applying for state funding to assess storage supplies? Such a review is important because if a stream is fully allocated year round, the public should not be funding a study for a project that would be attempting to get around existing water allocation policies.
- Is the WRD ensuring that applicants that are seeking to enlarge existing reservoirs are complying with existing permit/certificate conditions on their existing project?
- Is the WRD assessing applications to study the feasibility for conservation projects to ensure compliance with existing laws
- Is ODFW conducting a review to determine whether the project would be at all capable of meeting Division 33 and other fish standards?
- For proposals to study "conservation projects" that claim to have a benefit to streamflows yet don't call out the Conserved Water Statute, does the WRD check in with the applicant to better understand their intent?

The answers to these and other inquiries should be part of the review.

#### 3. A higher percentage of the funding should be dedicated to conservation and reuse projects.

The proposed allocation of 1069 grant dollars continues to be inordinately weighted towards storage projects, with at least 45% of Tier I dollars recommendations directed to storage projects. This imbalance in the proposed grants should be addressed.

Given that the Water Conservation, Reuse and Supply Program is dispensing public funds, we strongly recommend that a higher percentage be dedicated to conservation and reuse projects, especially to those which will provide some public benefit. Before spending public money to study projects such as the proposed Valsetz Dam on the Siletz River, the state should invest more money to explore the prospects for meeting new water supply needs via conservation, as well as instituting common sense demand side management measures, such efficiency standards, and measurement.

# **Specific Project Comments.**

# 1. WISE Project

WaterWatch endorses the funding recommendation for the WISE Project. This project has the potential to provide a substantial conservation dividend and provide multiple benefits to all participating parties and local streams. Unlike many of the proposals, which seek public money to provide almost exclusively private benefits, this type of project ought to be a model for this grant program. WaterWatch fully supports this proposed grant.

#### 2. City of Dundee

WaterWatch was impressed to read about the City of Dundee's recycled water project and is pleased to see that the city is being awarded a grant to help with this forward-looking and progressive project. This type of project, which stretches existing supplies, is a great use of the 1069 funds and WaterWatch's supports funding for it.

#### 3. Drift Creek/East Valley Irrigation District

SB 1069 and its implementing rules only allow funding of a study for a proposed storage project of this type (impounding surface water on a perennial stream or diverting water from a stream that supports sensitive, threatened or endangered fish or diverting more than 500 acre-feet of surface water annually; and for municipal use) if the study includes certain components. OAR 690-600-0020(4)(f). Here the study described in the application fails to include certain required components, and fails to adequately address others.

Specifically, the study description fails to include the following components:

OAR 690-600-0020(4)(f)(A). "Analyses of by-pass, optimum peak, flushing and other ecological flows of the affected stream and the impact of the storage project on those flows."

The application refers to a planned "time-step hydrologic yield & analysis" (Application at p. 10) that will "be performed given historical data and recently gathered flow data at different levels of irrigation withdrawal and differing schedules, using representative flow years." (Application at p. 6). It also references a "water quality model provided by PSU showing discharge schedules relevant to water temperature" (Application at p. 10).

It is unclear from these statements, and the application as a whole, whether East Valley Irrigation District intends any element of the study to focus directly on "Analyses of by-pass, optimum peak, flushing and other ecological flows of the affected stream and the impact of the storage project on those flows." Further, the funding criteria require that each applicant "describe the technical aspects of the study and explains why the technical approaches are appropriate for the planning study and accomplishing the goals of the study." (Water Conservation, Reuse and Storage and Grant Program – Criteria and Evaluation Guidance (July, 2008) at p. 2). Although the application includes a description of the "technical aspects" of the "time-step hydrologic yield analysis" (Application at p. 6) and of the "water quality model" (Application at p. 8), it wholly fails to explain "why the technical approaches are appropriate for the planning study" as required by the funding criteria. To be more specific, water quality is only one element of an analysis of a projects impact on "by-pass, optimum peak, flushing and other ecological flows". It is unclear how the use of a "water quality model" in conjunction with a "time-step evaluation" are sufficient to meet the requirements of OAR 690-600-0020(4)(f)(A).

We also note that where actual data is available, that data should be used and preferred to the use of computer models.

**OAR 690-600-0020(4)(f)(B)**. "Comparative analyses of alternative means of supplying water, including but not limited to the costs and benefits of conservation and efficiency alternatives and the extent to which long-term water supply needs may be met using those alternatives."

The study described in the application includes two sentences related to this element. The first sentence states, "EVWD provided a detailed comparative analysis of water supply options with its prior grant in July 2011." (Application at p. 10). The second sentence adds, "There has been no change to that analysis". (Application at p. 10). The prior report insufficiently examined alternatives. Reliance on that report here is inadequate.

**OAR 690-600-0020(4)(f)(D).** "Evaluation of the need for and feasibility of using stored water to augment in-stream flows to conserve, maintain and enhance aquatic life, fish life and any other ecological values."

The application states that "the analysis of flows, discharge scheduling and review of fishery habitat and relative operation" will update its July 2011 report. Application at p. 10. However, the application fails to explain how the study plans to use this data to evaluate "the need for and feasibility of using stored water to augment in-stream flows to conserve, maintain and enhance aquatic life, fish life and any other ecological values" as required by OAR 690-600-0020(4)(f)(D) in order to be eligible for funding. Although the application states the study will emphasize "providing cool water for fish protection and warmer flows for irrigation", this is only one element of conservation of "aquatic life, fish life or other ecological values." (Application at p. 11). The application's focus on water temperature only fails to address the range of elements required by OAR 690-600-0020(4)(f)(D).

The application shows that the proposed study will not adequately address OAR 690-600-0020(4)(f)(D), and thus this project study has improperly been recommended for funding.

#### **Other Issues:**

It appears that the District will be seeking a fish passage waiver and that the project presumes that existing migratory fish, including coho salmon and steelhead habitat will no longer be available or accessible to those fish as a result of the construction of a dam. The answer to Question 3, Common Criteria states that acquisition of the data necessary "to procure [among other things]. . . a fish passage waiver . . . are priority tasks" in this phase of study. WaterWatch suggests that projects that are aiming to secure a fish passage waiver before performing the studies necessary to determine the feasibility of passage should not be funded.

Furthermore, the Project reliance on a model purporting to demonstrate maximum production of steelhead and coho that relies on surrogate values is insufficiently reliable for the determinations that would be triggered by this project.

The combination of the application's failure to meet the various funding requirements described above demonstrates that this project study has been improperly recommended for funding.

#### 4. Valsetz Project/Polk County

SB 1069 and its implementing rules only allow funding of a study for a proposed storage project of this type (impounding surface water on a perennial stream or diverting water from a stream that supports sensitive, threatened or endangered fish or diverting more than 500 acre-feet of surface water annually; and for municipal use) if the study includes certain components. OAR 690-600-0020(4)(f). Here the study described in the application fails to include certain required components, and fails to adequately address others.

We note that Polk County appears to have copied verbatim some of the inadequate answers from its prior 1069 application and reused those answers in the current application. To the extent those answers were inadequate in the prior application, they are still inadequate today.

Specifically, the study description fails to include the following components:

OAR 690-600-0020(4)(f)(A). "Analyses of by-pass, optimum peak, flushing and other ecological flows of the affected stream and the impact of the storage project on those flows."

The application mentions streamflows and fish in a few places, but never addresses whether or how the study will address component OAR 690-600-0020(4)(f)(A). Its response to this component states "This analysis was initiated in the 2010-2011 Valsetz Water Storage Concept Analysis. This proposed study will further the assessment by including an evaluation of the time trend of water releases relative to instream flow rights." (Application at p. 20). The application references a plan for "modeling of flows, temperature and dissolved oxygen." (Application at p. 6).

However, it is unclear from these statements, and the application as a whole, whether Polk County intends any element of the study to include "analysis of by-pass, optimum peak, flushing and other ecological flows o the affected stream and the impact of the storage project on these flows." Because there are no current "instream flow rights" for elevated flows on the Siletz, a reference to those rights as defining the scope of the proposed study is completely inadequate to meet the requirements of this standard. Further, the funding criteria require that each applicant "describe the technical aspects of the study and explains why the technical approaches are appropriate for the planning study and accomplishing the goals of the study." "Water Conservation, Reuse and Storage and Grant Program – Criteria and Evaluation Guidance (July, 2008) at p. 2. The application includes no such description regarding the required study element OAR 690-600-0020(4)(f)(A).

**OAR 690-600-0020(4)(f)(B).** "Comparative analyses of alternative means of supplying water, including but not limited to the costs and benefits of conservation and efficiency alternatives and the extent to which long-term water supply needs may be met using those alternatives."

In response to this requirement, the application states, "To the degree that was feasible...the 2010-2011...Analysis included an analysis of alternative means of supplying water and the extent to which long-term water supply needs may be met using those alternatives." (Application at p. 20). However, the following statement made by applicant indicates that

applicant has misunderstood the requirements of OAR 690-600-0020(4)(f)(B) and does not intend to adequately address the requirements in its study. Applicant states, "The proposed 2012-2013 analysis will include...a reconnaissance-level examination of possible alternative locations, in addition to incorporating existing information regarding alternative means of supply water by reference." (Application at p. 20).

Since the point of OAR 690-600-0020(4)(f)(B) is to evaluate whether long term water supply needs can be met with conservation and efficiency (or other alternatives) - *instead of the proposed large storage project* – applicant's plan to examine "possible alternative locations" for a planned storage project completely misses the mark in terms of what is required under OAR 690-600-0020(4)(f)(B).

Further, the application never describes how it will accomplish the broader "[c]omparative analyses of alternative means of supplying water" required by OAR 690-600-0020(4)(f)(B). The funding criteria require that each applicant "describe the technical aspects of the study and explains why the technical approaches are appropriate for the planning study and accomplishing the goals of the study." "Water Conservation, Reuse and Storage and Grant Program – Criteria and Evaluation Guidance (July, 2008) at p. 2. The application includes no such description regarding the required study element OAR 690-600-0020(4)(f)(B).

The application shows that the proposed study will not adequately address OAR 690-600-0020(4)(f)(B), and thus this project study has improperly been recommended for funding.

**OAR 690-600-0020(4)(f)(C).** "Evaluation of the need for and feasibility of using stored water to augment in-stream flows to conserve, maintain and enhance aquatic life, fish life and any other ecological values."

Applicant's response to this requirement states, "The analysis of the time trend of water releases will also be used to determine if stored water will be available to augment instream flows during critical life states of aquatic species." (Application at p. 20). This response shows that once again, applicant has misunderstood what is required under OAR 690-600-0020(4)(f)(C). Applicant is required to show how it plans to address not just the feasibility of using stored water to augment in-stream flows to conserve, maintain and enhance aquatic life, fish life and any other ecological values, but also the *need for* using stored water to achieve the goals of this requirement. "Need" as used in this requirement, refers to the water needs of aquatic life, fish life and any other ecological values. Thus, to satisfy the requirements of OAR 690-600-0020(4)(f)(C), applicant must have a plan to evaluate/study the ecological needs of the waterways and ecosystems that will be affected by the proposed storage project. Applicant's proposed study includes no such plan. By only including a plan to study the feasibility of using stored water and not having a plan to study the ecological needs applicant has failed to comply with the requirements of OAR 690-600-0020(4)(f)(C) and has been improperly recommended for funding.

Applicant's answer to number four (p. 21) is not responsive to the question, and highlights the proposed study's deficiencies regarding OAR 690-600-0020(4)(f)(B).

Question number four on page twenty-one asks the applicant to "[p]resent convincing argument that there are no other reasonably achievable alternatives that would be able to meet the water supply need(s)." Applicant answers that there is no such argument to be made by stating:

"To be completely candid, today there are other achievable alternatives for most of these providers to pursue individually" and "We believe the project is valid and could make a lot of sense even though there are other alternatives available."

Further, given that there are, according to applicant, "other achievable alternatives," the importance of the study properly addressing OAR 690-600-0020(4)(f)(B) becomes even more important. If there are other alternatives, SB 1069 and its implementing rules require the proposed study to include an analysis comparing those alternatives the proposed storage project.

While WaterWatch supports appropriate regional water supply planning and coordination, the foundation must be accurate and informed analysis of each of the available alternatives that includes conservation and efficiency opportunities and accurate demand forecasting. None of that appears to be included in the proposed study despite applicant's acknowledgment that there are other available alternatives.

An application must contain an accurate and informed analysis of each of the available alternatives that includes conservation and efficiency opportunities and accurate demand forecasting. None of that appears to be included in the proposed study despite applicant's acknowledgment that there are other available alternatives. Applicant's admission that there are other achievable alternatives, in conjunction its failure to meet the requirements discussed above, should have caused this project to be ranked no priority for funding.

#### **Other Considerations:**

The Valsetz proposal poses significant problems for salmon and steelhead, including species protected under the Endangered Species Act and listed as State Sensitive.

This project would cause significant adverse impacts to sensitive and ESA listed species, including, but not limited to: loss of a substantial area of habitat used by sensitive species due to flooding and potential passage problems (or lack of passage) at the proposed dam; and unnatural streamflow alterations from the proposed use of the South Fork and mainstem Siletz Rivers as a conveyance for large quantities of water to Lincoln County. See prior 1069 grant application.

State sensitive fish species in and above the project area include coastal steelhead, which are listed as State Sensitive – Vulnerable. Other fish in the watershed that would be affected by the proposed project, though may not be in the proposed reservoir area, include: coho (State Sensitive – Critical; Federally Threatened under the Endangered Species Act); and coastal cutthroat, coastwide below natural impassable barriers (State Sensitive – Vulnerable).

The impacts of the proposed project would be clearly inconsistent with the review standards of the Water Resources Department and Oregon Department of Fish and Wildlife. For example, OAR 690-33-330(2)(b) applies the following standard for a water allocation application which the Water Resources Department determines may affect sensitive, threatened or endangered fish species: "[i]n all areas of the state where sensitive species are located, no net loss of essential habitat as defined in OAR 635-415-0005(4)." (OAR 635-414-005(3) defines "Essential Habitat" to mean "any habitat condition or set of habitat conditions which, if diminished in quality or quantity, would result in depletion of a fish or wildlife species.")

It is poor public policy to allocate public money for continued study of a project that so clearly would violate state law and so significantly and adversely impact salmon and steelhead populations. Certainly this cannot have been the intent of SB 1069.

The Valsetz proposal should not receive public funding under the 1069 grant program.

#### 5. Hood River County.

This project application in many places parrots the language of the relevant rule without providing any specificity as to how the required elements of the rules will be addressed in further work. The questions are directed to how an applicant will address the requirement in a planning study, not whether the applicant will do a study. The "how" is not specifically addressed in the application answers. As such, these responses do not meet the requirements of the relevant rules. The Department should require the applicant to answer the applications fully to determine precisely how the applicant will meet the requirements of the rules before this application is forwarded to the Water Resources Commission for any action.

Similarly, the application identifies OWRD as the agency that will provide a peak and ecological flow analysis. The appropriate agency is the Department of Fish and Wildlife, not OWRD.

WaterWatch also has process concerns. Statements are made in the application about broad participation by groups including environmental groups, yet none are listed in the HRWPG.

This application also discusses instream flows, but it should be noted that the Middle Fork Irrigation District has a pending protest against the OWRD's proposed transfer of 500 cfs instream as a result of the decommissioning of the Powerdale Dam. Interestingly, 500 cfs is precisely the flow requirement recognized in this application as essential to doubling the runs of ESA listed steelhead in the Hood River. Oregon should not provide any public money for this study

where a core member of the HRWPG applicant group (the Middle Fork Irrigation District) is collaterally attacking one of the express outcomes that the grant application suggests is desirable.

Thank you for this opportunity to comment. If you have any questions, please do not hesitate to call.

Sincerely,

John DeVoe

From: chappell@teleport.com

**Sent:** Sunday, March 11, 2012 2:19 PM

To: Bill Fujii

Subject: Polk County grant request

Attachments: Letter to Bill Fujii March 11 2012.doc

Mr. Fujii,

Thank you for taking the time to read my email conerning Polk County's request for grant funding to continue their feasibility study of constructing a dam and reservoir on the South Fork of the Siletz River. In case there is a problem with the attached document, I have also copied and pasted it below.

Corby Chappell

March 11, 2012

# Mr. Fujii:

I am against the State of Oregon granting \$80,538 to Polk County to continue their feasibility study of constructing a dam and reservoir on the South Fork of the Siletz River. The county has already spent \$162,000 from a grant in 2009 for their *Valsetz Water Storage Concept Analysis* [http://www.co.polk.or.us/cd/eh/valsetz-water-storage-concept-analysis] that was made public in September 2011. What Polk County needs to apply for is a grant to fund a study on how to utilize the Willamette River as a future water supply source.

In an age when dams are being removed to improve watersheds and re-establish anadromous fish runs (Gold Ray Dam, Marmot Dam, Condit Dam, two dams on the Elwha River, and hopefully four dams on the Klamath River), constructing a dam and reservoir on the South Fork of the Siletz River is not environmentally sound and is just plain wrong.

According to Derek Wilson, Assistant District Fish Biologist with the Oregon Department of Fish and Wildlife (ODFW), the reservoir created by a dam would destroy twenty to twenty-five miles of spawning and rearing habitat for wild summer steelhead, spring, summer, and fall Chinook, coastal cutthroat trout, and lamprey eel. The ODFW considers the Siletz River wild summer steelhead to be a species of concern. Also, the Siletz River is the only Coast Range basin in Oregon with a wild run of summer steelhead. A dam would also interfere with the downstream migration of gravel needed to preserve established spawning beds below the proposed dam.

Polk County needs to be looking into future water supply sources since the county continues to grow, but a dam and reservoir on the South Fork of the Siletz River should not be considered as a viable option. In fact, here is some interesting information taken from a report for Polk County Water Providers titled *Regional Water Needs Assessment Final Report* dated June 2004.

 $[https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/8724/Polk\_Water\_Needs\_2004.pdf?sequence=1]$ 

Through the analysis of options, three other alternatives were examined and then later excluded due to one or more fatal flaws. Those options included:

- Valsetz Dam and Reservoir
- Willamina Creek Storage
- Rickreall Creek Storage and Groundwater Development

The major reasons for exclusion of these options were owed to difficulty in delivery of source water to a regionally acceptable location, lack of sufficient supply capacity, and redundancy with regards to the other options already being considered.

In that same report under Section 4, Supply Strategies (Table 4-1), the Willamette River is listed as the three top options for proposed water supply alternatives for Polk County.

Mr. Fujii, I love the Siletz River. I have been fishing and enjoying this area since 1971. Since 2003, I have been a volunteer with the ODFW working the Siletz Falls fish trap where we pass wild summer steelhead and spring, summer, and fall Chinook above the trap so they can head upstream to spawn in the area that a dam and reservoir would destroy. Polk County needs to abandon their dam and reservoir proposal as a future water supply source and look into alternative water supply sources such as the Willamette River. Please do not grant Polk County the \$80,538 to continue their South Fork of the Siletz River dam and reservoir feasibility study.

Thank you,

Corby Chappell 1063 Randall Way Independence, OR 97351

From: Cyndi Karp <cyndikarp@peak.org>
Sent: Monday, March 12, 2012 5:27 PM

To: Bill Fujii

Subject: 2011 SB1069 Polk County

Please Reject the funding request for the 2012-2013 Valsetz Water Storage Concept Analysis Application.

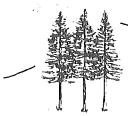
I want to make it very clear that I stand against any money being spent to Take Water from one critical watershed, in this case, the Siletz Watershed Basin and bring water across the coast range for Valley Water Wish Lists. The Siletz Watershed Basin is critical for the Recovery of Fish on the Coastal System. No Water Should Diverted to the Valley from the Siletz Watershed Basin. Coastal Fish Populations needs every drop to stay within the Siletz River Watershed Basin system. There are already enough issues to compensate for all of the impacts from heavy logging.

The Valsetz Water Storage Proposed Site is on an old contaminated Mill Site. Common Sense tells any person that an old mill site should not be used for Water Storage for the Public. There are no long term studies that proves the water will be safe. I want to see factual based information that proves beyond any shadow of a doubt. That can not be done at this site. Polk County needs to find a Polk County Valley Site to Collect Willamette River Watershed Waters for water consumption.

Cyndi Karp PO Box 506 Waldport, Oregon 97394 541-272-2412

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# DICKMAN FARMS, INC.

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WATER RESOURCES DEPT SALEM, OREGON

March 8, 2012

Mr. Bill Fujii, Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer St. NE Suite A Salem, OR 97301

RE:

2011 Water Conservation, Re-use and Storage Grant Program

Letter of support for Fessler Nursery and East Valley Water District grants

To whom it may concern:

I am writing to express our strong support of two particular projects which the Application Review Team recommended for funding under the 2011 Water Conservation, Re-use and Storage Grant Program. We believe these two projects address water quantity issues in our immediate area, and deserve the recommendation given by the Review Team, and the Oregon Water Resources Commission's approval and funding.

I am a resident of the area between Mt. Angel and Scotts Mills, and farm with several other members of my family. Much of our farmland is located within the boundaries of the Mt. Angel Groundwater Limited Area.

The crop mix common to our area depends upon a reliable source of irrigation water to maximize production, and economic return to our state. Although most of our acreage is covered by water rights issued prior to the groundwater limited area designation, there are many acres within the area (including some of ours) which do not have water rights; they never will unless new sources of water are available. Concerns about over-drafting a stressed aquifer also drive us to seek new water supplies, to protect this important resource. Identifying and developing new sources of water is critical, not only to agriculture, but to the thousands of residents living within the groundwater limited area, including those in the City of Mt. Angel.

Our farm has been working to develop an Aquifer Storage and Recovery (ASR) project, similar to the one being developed by Fessler Nursery. We know firsthand the challenges involved; the bar for ASR is set high, particularly with regard to the water quality standards for injection water. Like Fesslers, we are optimistic that ASR projects will be effective in giving us additional irrigation water, but getting to an actual working system is expensive. Grant funding to Fesslers' project will not only benefit them, but it will benefit all of us who seek to solve water shortages using this innovative approach.

Our farm is also a member of the East Valley Water District. We believe the District's goal of storing surface water to provide additional irrigation water to our area is also crucial to the long term viability of irrigated agriculture in this community. Grant funding to our District will assist the District in the final steps necessary prior to construction of a storage project.

There is no one correct solution to water shortages in our state, as the 23 applications accepted by the Department show. Solving water quantity problems must be done on the local level, with techniques appropriate to each situation. The Fessler Nursery and East Valley Water District grants are appropriate for the Mt. Angel Groundwater Limited Area, and I strongly urge the Commission approve and fund them. Thank you for your consideration.

Mark Dickman

Sincerely,

Copies: Dale Fessler, Fessler Nursery
East Valley Water District

Malia Kupillas, Pacific Hydro-Geology

Bill Fujii Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer St. NE Suite A Salem, Oregon 97301

March 8, 2012

Dear Mr. Fujii:

I would like to comment on the Polk County application for the Water Conservation, Re-use and Storage Grant Program for the 2011-2013 biennium.

I object to any funding for this application. I am concerned about the Polk County application for \$80,538 worth of funding was recommended for funding subject to funding being available and a secondary application process. The project is too premature for a feasibility study as there is significant concern and controversy about the project for out of basin water diversion, for water diversion and storage in a basin that has rare and depressed runs of summer steelhead and spring Chinook, and cause of the effects of such a dam on hydrology and water quality. The state does not to need to spend \$80,000 or even \$10,000 to learn that this project will not fly due to the level of controversy, that will not be resolved by the questions being posed in the application.

This program is designed to fund the qualifying costs of planning studies, that evaluate the feasibility of developing water conservation, re-use or storage projects. The proposed Polk County application keeps looking at the technical feasibility for building the dam based on the "further assessment" recommendations in the "2011 Valsetz Water Storage Concept Analysis" such as

- 1. Collection of LIDAR data
- 2. Expanded modeling of flows and ,water temperature to evaluate potential use of variable level intakes to modify temperature and dissolved oxygen in the reservoir and downstream of the dam
- 3. Modeling of the effect of reservoir management options on dissolved oxygen
- 4. On the ground surveys of sensitive plants near the head of the proposed reservoir
- 5. On the ground surveys of fish presence/absence and habitat quality in the tributaries upstream of the proposed dam
- 6. Expansion of the assessment of alternatives, to include a reconnaissance-level examination of possible alternative locations.
- 7. Instrumentation to measure water temperature, climate, and stream flow.

Those are hardly the questions though; the question is the social acceptability of this project, especially when Lincoln County has moved away from a regional water storage concept, or is not actively pursuing it now and when salmon runs remain woefully depressed and coho are still listed, and when Polk County has not made serious progress on water conservation and re-use in their own basin. Other issues concern contaminants that may be inundated by the impounded waters and get into the water system.

I am not in favor of spending any more state money on such misdirected efforts.

Sincerely,

Fran Recht

Citizen P.O. Box 1344 Depoe Bay, OR 97341 Mr. William H. Fujii,

I can't tell you how much this proposed dam concerns me. All across the great state of Oregon dams are being removed for the negative ecological impacts on our threatened salmon and steelhead populations. This study is ill conceived, and this dam would threaten one of the few remaining refuges of wild salmon left in the lower 48. As a resident Oregon, I plan on opposing this vehemently until the issue is put to rest. If you must build another Dam, I have some advice for you. Choose a river with salmon runs that have been decimated already, or one with a heavy hatchery influence. Do not mess with a watershed that still supports a healthy run of wild fish. Oh, and make sure to put some good lawyers on retention, because you will get sued (see Klamath river). This will obviously meet opposition from many people like me. This grant money will be wasted on a dead end idea, and should be put towards a more serious project.

Don't do it,

Gordon Rose

551 NW Brooks St, #5

Newport, OR 97365

From: Grant Scheele <gscheele@farmersagent.com>

**Sent:** Tuesday, March 13, 2012 11:33 AM

To: Bill Fujii
Subject: Siletz Dam

Mr. William H. Fujii,

I can't tell you how much this proposed dam concerns me.

I have been fishing(37 years) and guiding (18 years as Grant's NW Guide Service) the Siletz River for almost my whole life.

I am a member of the CCA(Coastal Conservation Association) and Northwest Steelheaders.

All across the great state of Oregon dams are being removed for the negative ecological impacts on our threatened salmon and steelhead populations. This study is ill conceived, and this dam would threaten one of the few remaining refuges of wild salmon left in the lower 48.

As a resident Oregon, I plan on opposing this vehemently until the issue is put to rest. If you must build another Dam, I have some advice for you. Choose a river with salmon runs that have been decimated already, or one with a heavy hatchery influence.

Do not mess with a watershed that still supports a healthy run of wild fish. Oh, and make sure to put some good lawyers on retention, because you will get sued (see Klamath river). This will obviously meet opposition from many people like me. This grant money will be wasted on a dead end idea, and should be put towards a more serious project.

Thanks, Grant

**Grant Scheele** 

**Grant's NW Guide Service** 

541-990-6358

March 13, 2012

Mr. Fujii,

I am opposed to any damming of the Siletz River.

The Siletz is one of the last pristine rivers on the Oregon coast that has a native run of summer steelhead. Any project that affects the runs of ESA listed salmon or steelhead would require an environmental impact statement. Miles of prime Chinook habitat on the South fork would be destroyed by the reservoir. Other species of Coho, sea run cutthroat, chum, winter steelhead, and lamprey eels share the river and would be threatened by any dam.

Why would anybody want to put up a dam? Look at the Elwha river dam removal project or any of the dam removal projects in the Northwest. It's not cheap and took an act of Congress to remove the Elwah.

Any reservoir would create too much frog water. I wonder what the river would look like a pond with bass and warm-water species.

Polk County needs to look at other options. Water exists in the Willamette River which supplies water to Wilsonville and Corvallis. The technology exists to filter the water.

Sincerely,

Jeff Huggart

March 3, 2012

Re: Polk County and the Siletz River

Hello Mr. Fujii,

I'm writing to urge you deny Polk County's request for funds to study water acquisition from the Siletz basin.

The Siletz River is such a vital river to the health of ESA listed coho and economically vital Chinook and steelhead that, in my opinion, no dam or other threat to this river will be approved in the current social and political climate. By funding Polk County's project, you'll be wasting the state's money.

Dams are coming down across the west and for good reason: no dam has ever helped "anadromous" fish populations (fish born in freshwater who migrate to the sea to feed before returning to spawn). In fact, dams have been shown again and again—despite promises of not harming fish—to be among the biggest killers anadromous fish. In light of the recent decommissioning on the Sandy, Elwha, and (forthcoming) Klamath Rivers, a new dam on the vital and singular Siletz River seems extremely unlikely—especially given the proposed dam would drown the key spawning habitat for ESA listed coho.

Polk County should consider studying the acquisition of water rights from the Willamette River water, just as Corvallis and other municipalities do upstream, and downstream.

I urge you to decline any further funding for this project.

Respectfully,

John Larison Siletz River Fishing Guide Siletz River Steward, Native Fish Society

From: Ken Bierly

Sent: Thursday, March 01, 2012 1:06 PM

To: Bill Fujii

Subject: Water Conservation, Reuse and Storage Grants

The Oregon Watershed Enhancement Board has a long relationship with the Walla Walla Watershed Council. We have funded canal piping projects and have seen them increase the knowledge about the shallow groundwater aquifer and "spring creeks" that flow over the alluvial fan that have been intercepted by irrigation infrastructure. I am very supportive of their efforts and quite confident that they will complete what they propose. If there are funds for additional projects I strongly encourage consideration of the project proposed by the watershed council.

From: Ken Bierly

**Sent:** Thursday, March 01, 2012 12:59 PM

To: Bill Fujii

Subject: Comments on two proposed Water Conservation, Reuse and Storage Grants

The Oregon Watershed Enhancement Board has been working with the Deschutes River Conservancy (DRC) for the last four years to address limiting factors to the successful reintroduction of salmon and steelhead above Round Butte dam. The partners (Upper Deschutes Watershed Council, Crooked River Watershed council, DRC, and Deschutes Land Trust) have made significant progress, however there is additional work that needs to be done. The work proposed by DRC will identify future water conservation projects that will be critical for meeting the ends proposed. OWEB has a strong commitment to the partners for funding implementation. Your favorable consideration of the grant application from the Deschutes River Conservancy will help in this endeavor.

From: Mark Garcia <mgarcia@lacodiatech.com>
Sent: Thursday, March 15, 2012 12:05 PM

To: Bill Fujii

Subject: Support for Grant Approval, Reuse and Storage Grant Program

#### Dear Bill Jujii,

I would like to express my support for approval of the grant for Tri City Water & Sanitary Authority, Myrtle Creek. As a Board Member I know firsthand how valuable this grant money is to the people living in the Tri City – Myrtle Creek area. I also know that it will be spent judiciously towards the planning and eventual development of a new larger water storage tank that is required to reduce our intake from the South Umpqua River during peak usage times.

Thank you for consideration. Mark Garcia



From: Mark Smith <marksmith8246@yahoo.com>

**Sent:** Tuesday, March 13, 2012 2:53 PM

To: Bill Fujii

Subject: Siletz watershed dam

Please don't waste the taxpayers money on this project. The Siletz River is one of the few remaining rivers in Oregon with a sustainable run of Chinook salmon. If anyone tries to dam up and destroy any of the natural spawning grounds of that river system they will run into more opposition than teeth on a buzz saw. Have you ever heard of the Coastal Conservation Association or the Northwest Stealheaders Association? If not, you should check them out. I suggest you save us all some money and forget about this project, cuz it ain't going to happen.

Mark..

Mark Smith 503-701-0660 marksmith8246@yahoo.com

# Save our salmon



http://www.ccapnw.org/index.html

March 14, 2012

Bill Fujii Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301-1266

RE: Polk County's grant application for "2012-2013 Valsetz Water Storage Concept Analysis"

I continue to be strongly opposed to using State of Oregon money to fund more analyses related to Polk County's terrible idea of building a new dam at the old Valsetz Dam site and diverting some of the water to the Willamette Basin. We are in an era of dam removal, especially on anadromous salmonid rivers such as the Siletz River, and tight State budgets. As I wrote in response to an earlier application for grant money for this project on October 12, 2008, the probability of rebuilding a dam at Valsetz is zero because it is fraught with ecological problems in two river systems with unique runs of salmon and/or steelhead (the Luckiamute River has winter steelhead), and will therefore be opposed by local, state and national (and perhaps international) angling and environmental organizations every step of the way to the highest courts needed for stopping the project. To use additional State funds for "analyses" is a waste of money needed by Oregon citizens for higher priorities. I would also like to point out that Polk County didn't even use the last grant the OWRD awarded for analyses at the local level, but chose ENVIRON International Corporation of Seattle, Washington, to do the analyses despite the abundance of excellent consultants available in Oregon – even within the Willamette Valley.

The Siletz River is one of only three coastal rivers in Oregon that support indigenous runs of summer steelhead, and one of a minority of coastal rivers in Oregon that support runs of spring Chinook salmon. The wild run of summer steelhead is the only summer run in strictly coastal rivers (the other two being in rivers with flow from the Cascade Mountains: the Rogue and Umpqua). It was nearly extirpated by 1990's and is now on its way to recovery, mainly through the efforts of the Oregon Dept. of Fish and Wildlife and many volunteers. The spring Chinook run is highly susceptible because its population is small, and human-related impacts in the basin threaten its habitat, especially extensive logging and roading.

We have entered an era of dam removal, not dam construction, due to the growing value society is placing on the remaining un-dammed rivers and scarce runs of wild fish. This is because of a growing recognition of the rarity and the ecological importance of naturally functioning watersheds that produce critical ecosystem services for human populations besides just the quantity of water delivered. It is also because of the growing body of scientific evidence that dams on rivers and human-induced alterations to natural patterns of streamflow, including natural floods and natural low flow periods, have negative impacts on the fish species that evolved in these rivers. And fish are only one of many biological species that have evolved with natural streamflow conditions over hundreds of thousands of years. There is the distinct possibility that a dam in the upper Siletz Basin will not only create an un-natural streamflow and temperature regime downstream, but alter the water chemistry, propagate fish disease organisms, and may even generate toxins to fish, all of which will compromise the population health of native species like the already compromised summer steelhead and spring Chinook salmon downstream.

Page 2 of 3, McPherson, March 14, 2012

Over the last decade, dozens of small dams and a few large dams have been removed in Oregon and Washington, and more large dams are likely to be removed soon. Examples include:

- 1. Marmot Dam in Sandy River
- 2. Little Sandy Dam in Sandy River Basin
- 3. Elk Creek Dam in Rogue Basin notched to river level (a dam left half-built for ~ 25 yrs)
- 4. Savage Rapids Dam in Rogue River
- 5. Gold Hill Dam in Rogue River
- 6. Gold Ray Dam in Rogue River
- 7. Powerdale Dam in Hood River
- 8. Condit Dam on the White Salmon River in WA across from Hood River
- 9. Elwah River dams on Olympic Peninsula (work began this winter)
- 10. Klamath River dams soon likely (Iron Gate, Copco No 1, Copco No 2, J.C. Boyle, and Keno dams)

In addition, interbasin transfers of water, like those proposed in this dam-and-divert project at Valsetz are loaded with risks for all basins involved. This adds even more risk than a dam alone. Some of the risks associated with interbasin transfers are:

- 1. Fish diseases and parasites
- 2. Zebra and quagga mussels
- 3. New Zealand mud snails
- 4. Non-native invasive fish and plants (e.g., smallmouth bass, largemouth bass, Amur gobi)
- 5. Toxic substances from old Valsetz mill and town site
- 6. Potential toxins from blue-green algae blooms similar to those at Diamond Lake

The presence of a reservoir increases risk that some of the above problems will occur due to:

- 1. Boats and boat trailers carrying "hitchhiking" organisms
- 2. Illegal planting of "favorite" fish in reservoir
- 3. Fish diseases carried by introductions of out-of-basin fish

I raise these issues based on a career spent in fishery research and management in Oregon (mostly with the Oregon Department of Fish and Wildlife, including over 15 years researching impacts of headwater dams on fishes of the Rogue River Basin). I have been a visitor and student of the Siletz watershed, its fish runs, and the Valsetz area for over 35 years. I am convinced that there will be unpredicted ecological impacts, especially for fish and other aquatic organisms, if the proposed dam-and-divert project is built in the Siletz Basin.

I am not opposed to all dams. Some dams less than 10 ft high with adequate passage facilities for all life stages of all native fish are acceptable to me. If we could come close to duplicating the function of beaver dams with their benefits to native fishes and water storage in watersheds, I would support such dams, but I would argue that it would be better to sustain beaver populations and let them build the most appropriate dams for the watershed. And I would argue that your agency needs to improve its coordination with forest management agencies and wildlife management agencies in Oregon to restore beaver populations and the abundance of beaver dams in our watersheds in order to improve water storage and streamflow moderation, as well as restore native fish populations.

Page 3 of 3, McPherson, March 14, 2012

In regard to local water supply, Lincoln County has a potentially good alternative water supply source in Rocky Creek between Newport and Depoe Bay. This would be a far better alternative to a dam in the Siletz River. There are no anadromous fish in Rocky Creek anymore due to the very tall Hwy 101 fill that essentially created a dam at the ocean/stream interface decades ago. I understand that the Oregon Dept. of Fish and Wildlife has expressed support for a Rocky Cr. Dam with appropriate mitigation for loss of resident fish and wildlife habitat, and the use of it as an alternative, not an additional source, to present stream withdrawals like those from the Siletz River.

I strongly believe that the top priority of your Water Conservation, Reuse and Storage Grant Program should be on funding conservation projects, and on funding watershed restoration projects that provide the ecosystem service of natural storage and streamflow moderation. One of the lowest priorities should be additional dam projects for storage and/or diversion, especially out-of-basin diversion. It may take pricing structures that charge lower rates to those who use less water, but we need to achieve much higher levels of water conservation in municipal, agricultural, and industrial uses before we start investing public money on any more dams on streams and rivers.

I'm convinced that being more efficient and controlling demand for all natural resources, not just water, is where our state, nation, and world communities need to direct their efforts in the light of impacts that natural resource depletion and the growing human population of the world is already having on future generations. I entreat the Water Resources Department to show leadership in this effort in your area of responsibility: Oregon water resources. Please do not invest any more public money on studies or other grants connected to rebuilding a dam at Valsetz on the Siletz River.

Thank you for your consideration of my views, Barry Musheron

Barry McPherson

905 NE 7<sup>th</sup> St.

Newport, OR 97365-2520

bdmcpherson@coho.net

Home: (541)574-6111



March 12, 2012

Mr. Bill Fujii Water Conservation, Reuse and Storage Grant Program Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301

Dear Mr. Fujii:

The Oregon Seed Council is pleased to write in support of the East Valley Water District's (EVWD) request for additional funding for important water and conservation outcomes for work on its Drift Creek Water Storage project in Silverton, Oregon.

The Drift Creek project is a proactive effort initiated by the district to develop an alternate water supply within the area of Silverton, Mt. Angel and Molalla. The district includes water users within the Glad Tidings, Mount Angel and Victor Point groundwater-limited areas. The project seeks to develop water for existing farmers and alleviate usage pressure on declining aquifers.

Funding from the Water Resources Department will help EVWD use the work already completed to take the next steps in their larger plan. We are pleased EVWD is also looking for additional funding resources beyond those potentially available through the Water Resources Department.

Oregon Seed Council believes the EVWD project continues to be a good candidate for funding, and clearly helps illustrate to policy makers and Oregonians the water challenges before our state. The values that make Oregon such a delightful and healthy place to live, work, and recreate include having working farms on the landscape. Water is a necessary component of high-value production agriculture and for healthy ecosystems.

The Oregon Seed Council supports the East Valley Water District's funding request. We look forward to their completion of the next phase of their plan.

Singerely,

Roger Beyer



Protecting Oregon's wildlands, wildlife, and waters since 1974.

www.oregonwild.org

Bill Fujii, Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer Street NE, Suite A, Salem, OR 97301 March 15, 2012

Email: William.h.fujii@state.or.us

Dear Mr. Fujii,

On behalf of Oregon Wild's more than 8000 members and supporters, I am writing you today to express support for the grant request recently submitted by the Talent Irrigation District for the WISE Project, and for greater water conservation in the Rogue Basin.

Founded in 1974, Oregon Wild is a non-profit conservation organization dedicated to protecting the wildlands, wildlife and waters of our state as an enduring legacy. Our work encompasses campaigns to protect Oregon's remaining pristine lands and waters as Wilderness and Wild and Scenic Rivers, promoting restoration-based forestry and an end to old-growth logging, and recovering native species of fish and wildlife to healthy, abundant populations.

Throughout our history, we have been particularly concerned about the health of Oregon's remaining wild salmon and steelhead runs, and ensuring these iconic fish have the water and habitat they need to thrive once again. In Southwest Oregon, we have been alarmed by the decline of wild coho salmon, now considered "threatened" under the federal Endangered Species Act, and have engaged in a number of efforts to improve conditions for these fish.

In the upper Rogue basin, water quantity and quality are major limiting factors to the health of wild coho runs, and since 2003 Oregon Wild has worked to ensure the US Bureau of Reclamation operates its Rogue Irrigation Project in accordance with the law, and provides water flows in streams such as Bear Creek and Emigrant Creek sufficient to ensure the recovery of this threatened species.

We believe that a key component of such a recovery effort is water conservation and increased water flow in coho spawning streams during critical times of the year. For that reason we strongly support the WISE funding request. Full funding of the grant will enable a full analysis of the potential benefits of the WISE Project, not only to the health of the Rogue and its tributaries, but also to tourism and recreation businesses, irrigators, and local communities.

Portland 5825 N. Greeley Ave. Portland, Oregon 97217 tel: 503.283.6343 Eugene P.O. Box 11648 Eugene, Oregon 97440 tel: 541.344.0675 **Bend** 16 NW Kansas Ave. Bend, Oregon 97701 tel: 541.382.2616 Oregon Wild strongly supports the Talent Irrigation District's WISE Project grant request, and urges the Oregon Water Resources Department to provide funding to this worthy and important initiative.

Sincerely,

Steve Pedery, Conservation Director

Bill Fujii
Water Supply and Conservation Coordinator
Oregon Water Resources Department

Dear Mr. Fujji,

Thank you for your time in considering my input in this matter. In the interest of brevity let me first say I am staunchly opposed to any efforts to create a dam/reservoir on the Siletz River system. I am also opposed to tax dollars being used to fund feasibility studies of such a dam.

Oregon has a long and rich history of leading the nation is forward thinking land use policies and smart growth models. While no one is ever one hundred percent happy with the results we all basically agree on the principle that growth should be balanced with protection of natural resources, open space, clean water and aesthetic concerns.

To dam the South Fork of the Siletz and send the water over the coast range into Polk County is quite simply preposterous. Over the last several years we have witnessed the demolition of many dams in the Pacific Northwest in order to protect anadromous runs of salmon, steelhead and cutthroat trout. To endanger the fish runs on the Siletz including their rare wild summer stealhead run in this day and age is unacceptable. It harkens to an era of engineering and planning from the 1930's, not 2012. The proposed project would also flood many acres of prime habitat for elk, deer, black bear as well as a myriad other species and would put under water cultural resources left by the river valley's original inhabitants.

I do not begrudge Polk County its desire to grow. But growth at any cost is not acceptable. The costs in this case are far too high.

Thank you for your time and consideration.

Sincerely,

Scott McAleer



Siletz Watershock Council 23 North Coast Highway Newport, OR 97365 541.265.9195

March 13, 2012

Oregon Water Resources Department

Attn: Bill Fuji

725 Summer Street NE, Suite A

Salem. OR 97301

Re: Public comment on Polk County's grant application for the Water Conservation,

Reuse and Storage Grant Program

#### Dear Bill:

I am writing you today on behalf of the Siletz Watershed Council to express concern over the proposed Valsetz Water Storage Concept. At this time we are taking a position of opposition of the grant proposal submitted by Polk County for OWRD's water conservation, reuse and storage 2011-2013 grant program. We are specifically concerned that the proposed grant assessments did not include the feasibility and cost analysis for the clean up of pollutants from the old sawmill or landfill sites. Below is a list of concerns we feel should be addressed in any grant that would receive funding.

- 1. The streams that would be flooded by the reservoir are important habitat for Summer Steelhead and Spring Chinook. The Siletz River is one of only three coastal rivers in Oregon that supports indigenous runs of summer steelhead, and one of a minority of coastal rivers in Oregon that support runs of spring Chinook salmon. The reservoir would also flood spawning and rearing habitat for both Cutthroat Trout and Pacific Lamprey.
- 2. DEQ did not consider inundation when they issued their No Further Action determination in 1992. Due to the potential of dioxin pollutants from the pentachlorphenol based glues typically used in the production of plywood at the Valsetz sawmill, the council strongly feels that extensive testing and removal of any sawmill wastes or dioxin contaminated sediments should be high priority.
- 3. The reservoir could affect temperature regimes in the river downstream that could negatively impact native stocks of salmonids and other important biota.
- 4. While the proposal indicates a 50-50 split of water between Polk and Lincoln counties, Lincoln County appears to have less of a need for water resources than Polk County in the foreseeable future. Due to the large agriculture industry, increased diversions of water to Polk County seem extremely likely at the expense of sensitive habitat down river.
- 5. Polk County hired an out of state consultant for the work done on the last grant funding received from OWRD. While we recognize the competitive bid process, we also feel that there should be priority given to grant applicants that help to support local economies.

I appreciate your time to consider our concerns and if you have any questions please contact me at (503)621-2433.

Sincerely, Aaron Duzik Siletz Watershed Council Coordinator

From: Steve Perakis <summersteelhead@comcast.net>

Sent: Tuesday, February 28, 2012 5:37 PM

To: Bill Fujii

**Subject:** reject Polk County's application to study a dam on the Siletz

Dear Bill Fujii,

I write regarding the application of Polk County for additional funding to study the feasibility of a dam on the Siletz River.

The funding requested by Polk County - I believe in excess of \$80K - is quite literally money down the drain for the State of Oregon. The Siletz River is so fundamentally unique and important for anadromous fish diversity in Oregon that no dam will get approved in the current social, political, and economic climate. It is a feasibility study of a dead-end proposition.

The Siletz River contains the <u>highest diversity of anadromous salmonids of any river in Oregon</u>. The summer steelhead are a species of particular concern, with low numbers teetering on ESA listing. A lack of rearing habitat for juvenile steelhead in the upper forks of the Siletz - including the South Fork that is proposed for dam construction - is a major limiting factor for survival of these rare fish. Inundation of the South Fork Siletz by a new dam / reservoir would eliminate important rearing habitat that ODFW has documented is used seasonally by steelhead and other species. Upriver connectivity would also be reduced or eliminated for spring chinook, cutthroat trout, and anadromous lamprey.

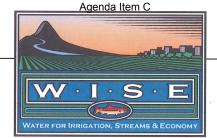
The creation of dams has negatively impacted native wild fish throughout Oregon in all instances of their construction. To seek approval to construct a dam these days, and in particular on a river like the Siletz with such high species diversity and local adaptation of unique runs, is pure folly.

Polk County should be studying the acquisition of water rights from the City of Adair or elsewhere to use Willamette River water, just as Corvallis and other municipalities do upstream, and downstream.

I urge you to decline any further funding for this project.

Respectfully,

Steven Perakis Corvallis, OR



Bill Fujii Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301

RE: WISE – Talent Irrigation District grant application support

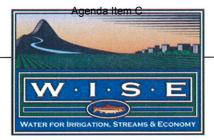
The WISE Project is a regional approach to developing solutions to water resource issues here in the Rogue Valley. The Project will improve irrigation reliability and availability while increasing instream flows and improving water quality. WISE represents a vital means of protecting our valuable water resources and the economic benefits that arise from them.

We, the undersigned, strongly urge the OWRD Commission to support full funding for the WISE Project grant request. Full funding of the grant will enable a comprehensive evaluation of the financial benefits of implementing the WISE project. These include the economic benefits of providing water under pressure to each irrigator, changes in cropping patterns, reduced operations and maintenance, improvements to stream habitats, increases in tourism and recreational fishing, benefits to local parks near streams and reservoirs, and the value of the hydro power generated by the project.

Funding this grant is a vital next step for the success of this project.

Sincerely,

John Stromberg Mayor of Ashland



Bill Fujii Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301

RE: WISE – Talent Irrigation District grant application support

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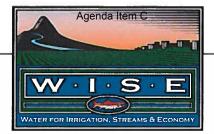
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Funding this grant is a vital next step for the success of this project.

Sincerely,

Paul Becker

Mayor of Jacksonville



Bill Fujii Water Supply and Conservation Coordinator Oregon Water Resources Department 725 Summer Street NE, Suite A Salem, OR 97301

RE: WISE – Talent Irrigation District grant application support

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We, the undersigned, strongly urge the OWRD Commission to support full funding for the WISE Project grant request. Full funding of the grant will enable a comprehensive evaluation of the financial benefits of implementing the WISE project. These include the economic benefits of providing water under pressure to each irrigator, changes in cropping patterns, reduced operations and maintenance, improvements to stream habitats, increases in tourism and recreational fishing, benefits to local parks near streams and reservoirs, and the value of the hydro power generated by the project.

Funding this grant is a vital next step for the success of this project.

Sincerely,

Gary Wheeler

Mayor of Medford