



OREGON
ASSOCIATION OF
NURSERIES™



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Oregon Water Resources Department
725 Summer Street NE, Suite A
Salem, OR 97301

Submitted via email: WRD_DL_waterstrategy@water.oregon.gov

RE: Comments on Oregon's Integrated Water Resources Strategy 2025-2031 Draft 2

The Oregon Association of Nurseries, the Oregon Farm Bureau, and the Oregon Water Resources Congress are providing comments on Oregon's Integrated Water Resources Strategy (IWRS) 2025-2031 Draft 2. We appreciate the time and attention provided to this important multi-agency effort. We have a few suggestions and recommendations on the document and overall process. Our primary request is that the next IWRS update be developed with a workgroup of stakeholders and agency leaders. We also request that the list of priority actions be informed by additional stakeholder feedback post-session.

Our associations collectively represent the largest sectors of irrigated agriculture, including farmers, ranchers, nursery growers, and agricultural water suppliers. Our organizations actively participated in the development of the legislation creating the IWRS in 2009, the creation of the first IWRS in 2012, and the 2017 update. Our board members have served on policy advisory groups, participated in open houses, and provided input on drafts. Our association's respective staff have also engaged in various iterations of the IWRS and provided comments on previous drafts before the Oregon Water Resources Commission.

In comparison to previous efforts, the process for developing the IWRS 2025-2031 Draft 2 was largely developed by the agencies internally and offered minimal opportunities for stakeholder engagement. We request the next update of the IWRS be developed similar to previous efforts, with a formal policy advisory group representing the broad array of water stakeholders, including both out-of-stream and instream interests. Online surveys or virtual workshops can inform the effort but are no substitute for discussion and direct engagement.

We also want to highlight that the timing for releasing this draft also was less than desirable, with a short public comment period during the legislative session and at the start of irrigation season, limiting participation from associations and individuals alike. We recognize the desire to complete the current update but urge the Department to take time to finalize the draft and conduct a more meaningful and comprehensive update in the future. It is better to take the time to get it right than it is to get it done quickly.

The draft has several inconsistencies in how the information is summarized and presented. For example, the “Strategy Objectives” summary does not accurately summarize what is in each chapter and needs to be fully revised once the other chapters are completed. Specifically, Objective 4, inappropriately elevates (by italics and bold) the ecosystems need and has no reference to any out-of-stream need. Similarly, Objective 2 mentions consumptive water use but has no mention of instream needs. It is crucial to explicitly include both instream and out-of-stream needs, and provide examples of each throughout the document, particularly in the proposed actions. Whether it is related to consumptive water use or for streamflow, it is important the IWRS represent our complex water resources needs in a balanced manner.

The document has lots of information about water needs but would benefit from additional discussion with stakeholders who can provide examples and add to the list of proposed solutions. For our members, this may involve examples of infrastructure projects, innovative technologies, or other water management strategies from a water user perspective. There is also little to no mention of the need to invest in water supply, including both above ground and below ground storage, or how new storage and delivery infrastructure may be needed to manage changes to precipitation or snowpack.

We also have concerns about the proposed priority agency actions, which were developed largely without stakeholder input and seem to be lopsided in prioritizing instream and ecosystem needs without proper inclusion of ways to meet consumptive water needs as well. It is unclear who developed the actions or how well they match existing agency authorities and staff resources. These actions also seem to move beyond the guidance structure of the IWRS and into policy directives, which is inappropriate without further vetting. This area will also need to be revisited after the legislative session since some of the ideas are included in proposed legislation or funding packages. Solutions for how we strategically meet our diverse water needs will be best developed through discussion with stakeholders and agency leaders outside of the legislative session.

We care about the wise management of water and look forward to future collaborative discussions about how Oregon can meet all of its current and future water needs.

Thank you for your consideration of our comments.

Sincerely,
Oregon Association of Nurseries
Oregon Farm Bureau
Oregon Water Resources Congress