



## Setting the Record Straight

There has been much discussion since farmers in North Unit Irrigation District had their water allocations reduced last summer. The district board was faced with that difficult decision after severe drought conditions resulted in unexpectedly low flows in the Deschutes River. With the district having the most junior water rights on the Deschutes, it was a difficult summer for everyone.

Meanwhile, 2021 was also the first year for implementing the Deschutes Basin Habitat Conservation Plan—a plan developed by North Unit, along with seven other irrigation districts. The plan was 12 years in the making, and was ultimately approved by the Fish & Wildlife Service.

Significantly, completion of the plan followed a lawsuit by environmental groups, in which those groups had sought to dedicate all stored water in Wickiup, Crane Prairie, and Crescent Lake to threatened species. While the court rejected the groups' proposed action, the court did so with direction to the districts to finish the plan.

Completed at the end of 2020, the plan provides all eight Deschutes Basin irrigation districts with a means for complying with the Endangered Species Act. In a nutshell, the plan ensures that threatened frog and fish species get the water they need when they need it, while giving the districts time to implement conservation measures to free up the water going to the species.

With all signs pointing to even more severe drought conditions this summer, it's been easy for some to point the finger at Fish & Wildlife Service for making the water situation worse. The March 9 letter to the editor ("Farmers, share your stories"), does just that. It couldn't be further from the truth. We're writing to set the record straight.

First, the Service does not have "total control" of the plan. The districts led the studies to support the plan, proposed the plan, and are now working collaboratively with the Service to implement the plan. And while the Service approved the plan, the districts have always been the drivers. We pursued the plan because it was a far better alternative to having other federal agencies or environmental groups through litigation dictate how district water would be managed to comply with the Endangered Species Act.

Jefferson County farmers need to look no further than their neighbors to the south, where farmers in the Klamath basin chose a different path. They have left it to federal agencies and the courts to dictate how water is managed in order to comply with the Endangered Species Act. And with regular water shut-offs since 2001, and with little to no Klamath project water likely allocated to farmers again this season, the approach is not one to emulate.

Second, while the Deschutes plan includes the potential for adaptive management, it's not a one-way avenue to simply "get farmers more water." Adaptive management focuses on current conditions in the Basin, and for example, may be used to alter the timing of storage releases to better match species needs. These adjustments often results in mutual benefits for farmers. However, they are the result of the districts working in good faith with the Service, following careful deliberations. They are not decisions taken lightly, and are certainly not left to the whim of the Service's Bend field supervisor.

Third, the plan provides for winter releases from Wickiup, with 100 cfs being the requirement for the first seven years of the plan. Again, pleas by individuals, "begging for a slowdown" of the releases in order to help farmers deal with drought, misconstrues what adaptive management entails. Just as the Service cannot demand that the district release more than 100 cfs for frogs in light of the drought, the district cannot simply demand that the Service allow the release of less. Adaptive measures have been taken already and will undoubtedly be taken in the future, but they are not employed in a vacuum, and not simply because water is short due to drought.

Fourth, the criteria for listing species as threatened or endangered does not include consideration of "economic impact." Rather, economic impacts are considered when designating critical habitat, and also in crafting conservation measures included in a plan. And while it's true that North Unit may have more to do under the plan as compared to some other districts, North Unit also has more relative impact on listed species than other districts, in addition to having the most junior water rights. It's why our partnership with the other districts is so important to making water management work for our district in the coming years.

Finally, the editorial asks others to communicate the extent of the negative impact the plan and the drought has had on Central Oregon's economy. And while we could not agree more about the impact of the drought, the editorial falls short in acknowledging that the plan is what is helping to keep Jefferson County farmers afloat. Without it, we would have no way of complying with the Endangered Species Act, and our water supply situation would only be worse—potentially even non-existent, just like it is this year again in the Klamath.

The Deschutes Basin habitat conservation plan and our partnership with other Deschutes districts is vital to the future of agriculture in Jefferson County. Don't be misled by those who would try to convince you otherwise.