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Water Resources Program
Washington State Department of Ecology
PO Box 47600
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Subject: **Report on Finding and Recommendations - Water Trust, Banking, and Transfers**

To Whom it May Concern,

Thank you for taking the time to consider my comments. I very much appreciate the work that has gone into the report by the Dept. of Ecology and the Advisory Groups participation. I've found it to be a valuable document that has moved the conversation significantly forward. I'd also like to thank the Legislature for directing Ecology to complete the study and applaud their leadership in this matter.

My perspective is of an agricultural land owner, a water rights holder, a fifth-generation resident of the valley, and a professional architect involved in many aspects of community leadership. Previously, I co-managed a family farming operation in Washington and Oregon which produced irrigated and dryland commodities. Although I did not participate in the Advisory Group meetings, I have watched all the recorded videos of the meetings, reviewed the documentation produced for the meetings, and read the report on the Findings and Recommendations on Water Trust, Banking, and Transfers. I am also participating in several other water studies in the Walla Walla valley. My comments are specific to the Walla Walla Valley WIRA as a headwater basin.

I propose that the Legislature place a temporary moratorium on out-of-basin transfers of water rights in the Walla Walla WIRA for the following reasons.

Walla Walla Basin Groundwater Study

The Washington Department of Ecology and Oregon Water Resources Department, along with the Confederated Tribes of the Umatilla Indian Reservation and USGS Oregon and Washington Water Science Centers have begun a transboundary study of the groundwater system in the WWRB to inform planning and water management decisions at a basin-wide scale. In this first year of study, the USGS is compiling existing hydrologic information, identifying and filling gaps in water-level monitoring, and collecting reconnaissance level geochemical information to guide the development of a more comprehensive workplan for a multi-year investigation of the Walla Walla River Basin groundwater hydrology. Despite the name, the Groundwater Study will play a significant role in our understanding of both ground and surface water systems. A moratorium on out-of-basin transfers until this study is complete will allow substantially more factual information to be considered. Absent this information, we not only run the risk of making water supply matters

worse, we will undermine the public resources spent to conduct the Walla Walla Basin Groundwater Study.

Emerging Market Pressure

According to an article in the Wall Street Journal on September 23, 2020, Exchange operators [CME](#) Group Inc. and [Nasdaq](#) Inc. are planning to launch a futures contract later this year that will allow farmers, speculators and others to wager on the price of water.

“The market will be the first of its kind, its creators say, putting water on the board for investors alongside other raw materials like crude oil, soybeans and copper”

Despite the Advisory Group’s recommendation for a statutory change allowing water right transfers to be moved back upstream, as a headwater basin, the Walla Walla valley may not have an opportunity to reverse out-of-basin water right transfers regardless of the rule changes since economic incentives offered by trading markets will easily overshadow local interests. A temporary moratorium in the Walla Walla WIRA will allow additional water resource information to be collected during the Walla Walla Basin Groundwater Study.

Walla Walla Water 2050

The Washington Department of Ecology and the Walla Walla Management Partnership, along with the Confederated Tribes of the Umatilla Indian Reservation and stakeholders on both sides of the state boarder, are currently developing a 30-year Strategic Plan for water management in the Walla Walla WIRA. The plan scheduled completion date is June 2021.

A temporary moratorium on out-of-basin water transfers will provide time for implementation of the 2050 Plan which is critical for local control of water resources. By contrast, Yakima has seen tremendous progress in the implementation of the Yakima River Basin Integrated Water Resource Management Plan. The Dept. of Ecology played the same key role in developing their plan which has had nearly 4 years to be implemented. Just as in Yakima, Walla Walla’s plan will require time to be implemented before we can fully understand its effect.

END COMMENTS