



October 12, 2017

To: State Advisory Commission on Historic Preservation  
Re: Proposed Designation of Historical Canal, Ward and Gosney Roads

The Coalition for the Deschutes is a nonprofit 501(c)(3) organization based in Bend, Oregon. The Coalition is a stakeholder and active participant in planning efforts currently underway in the Deschutes watershed.

The Coalition for the Deschutes respectfully requests denial of the applicants' request to have the section of the Central Oregon Canal between Ward and Gosney Roads designated as historic.

Approval of this request would undermine the work of local and national groups and agencies working to restore the historic upper Deschutes River, a State Scenic Waterway and federally designated Wild and Scenic river.

We are in support of the work of the many entities that have analyzed in thorough detail the Deschutes River and its problems through the decades. As a participant in a collaborative effort amongst all parties in the Deschutes Basin, we know changes must come in order to restore the upper Deschutes. Modernization of the canal systems is crucial to restoring the River to the historic flow levels that predate the canal systems.

Prior to the creation of the irrigation system, Deschutes River flows were extremely stable. This is extremely unusual in large rivers, and the stable year-round flows earned the Deschutes the moniker, the Peculiar River. Since the creation of the irrigation system—with its leaky canals and consequent excessive water required as “carry water”—the flows of the Upper Deschutes River have been highly altered, with extreme high flows in the summer irrigation season and extreme low flows in the winter months.

The minimum winter flows have been increased as a result of a recent litigation settlement that is in place while a Habitat Conservation Plan (HCP) is finalized. It is still drastically low in comparison to natural levels, and watershed stakeholders are working together to restore ecologically healthy, permanent winter flow to the Upper Deschutes. Piping the leaky canals is a crucial component of restoring flows to the Upper Deschutes.

The HCP will determine how COID and other Central Oregon irrigation districts must change in order to restore sufficient water to the river to meet the needs of impacted endangered species. It is highly unlikely that the irrigation districts can meet the requirements of the HCP without modernization of the canal systems, including the section described in this request.

It also seems clear to us that the greater good of the historic Deschutes River and its health outweigh the designation of this part of COID's main canal as historic.

Preservation of this section of canal precludes returning the Upper Deschutes to its status as a blue-ribbon fishery. Which is more historically significant—the restoration of the Deschutes to a vibrant, healthy river that is an asset to our entire community and sustains native wildlife, or a section of canal that has been repeatedly modified and will require continued modification to function?

Finally, we question this designation in the context of another study and ruling. As stated in written testimony by COID, a Multiple Property Document approved by the National Park Service was the result of a multi-year study that thoroughly examined the COID system in its totality. This piece of the canal was not designated in that study as historic.

In conclusion, there are multiple reasons why this designation does not make sense from both the macro perspective and as an individual decision. Modernizing irrigation and piping the leaky canals is crucial to restoring our river. Many people, including our own organization, have worked diligently to restore the historic Deschutes River. The river is not separate from the canals. The river predates the canals and requires that we all work together to ensure a healthy river basin now and in the future.

Sincerely,

Gail Snyder  
Co-founder, Executive Director

Cc: Tammy Baney, Deschutes County Commissioner  
Tony DeBone, Deschutes County Commissioner  
Phil Henderson, Deschutes County Commissioner  
Lauri Aunan, Office of Governor Kate Brown  
Craig Horrell, Central Oregon Irrigation District Manager

Enc. Photos of historic fishery in the Upper Deschutes River. Photos courtesy of the Deschutes County Historical Society.

The mission of the Coalition for the Deschutes is to work for the restoration and protection of the Deschutes River and its watershed through education and advocacy so that fish and wildlife can thrive and future generations can enjoy and benefit from a healthy river and watershed.