



June 25, 2021

Dear Commissioner Beverage and the Upper Grande Ronde River Watershed Partnership,

First, we want to congratulate you on the completion and adoption of a draft Place-Based Integrated Water Resources Plan. It is a big accomplishment that required a significant level of effort during five years of planning. We commend the group's willingness to initiate and lead a planning effort in partnership with the state during the pilot phase of place-based water planning. We share in a commitment to understanding the Upper Grande Ronde Basin's water resources and managing those resources in a balanced and integrated way that addresses instream and out-of-stream water needs for a more secure and sustainable water future.

The Plan Review Team identified some required improvements to receive a recommendation for state recognition. The review team does not take requiring revisions lightly. We understand the group wants to move on from the plan development stage after a long planning process. The required changes identified in this letter and attachments are necessary to demonstrate that the plan and planning process followed the 2015 Draft Planning Guidelines and principles of Oregon's Integrated Water Resources Strategy (IWRS), the minimum standard for state recognition. These changes will also greatly improve the plan, making it more accessible and favorable to funders, and to help facilitate implementation of the plan.

The Plan Review Team consists of staff from five state agencies: the Water Resources Department, Department of Fish and Wildlife, Department of Environmental Quality, Department of Agriculture, and Watershed Enhancement Board. Since your submittal of an adopted Draft Plan for formal agency review on April 22, 2021, the Plan Review Team worked with field and technical staff to determine if the Draft Plan demonstrates that the planning and the plan followed the 2015 Draft Planning Guidelines and principles of Oregon's IWRS. The Draft Step 5 Guidance published in 2019 includes a description of required plan contents and associated criteria, which the Plan Review Team used as a review tool.

The Plan Review Team approached the review with two primary questions, 1) does the plan follow the Draft Planning Guidelines and IWRS principles? and 2) if not, what modifications or improvements could be made as remedies to help the planning group? The review team considered the Draft Plan with four categories of comments in mind: strengths, required improvements, suggested improvements, and considerations for implementation. Based on its review of the Draft Plan, the review team identified a number of strengths as well as parts of the Draft Plan that require attention and/or revision for the review team to recommend that the Final Plan receive state recognition. Attachment 1 lists some of the strengths of the plan. Attachment 2 describes the required items that must be addressed to receive a recommendation from the review team for state recognition. To collaborate with the planning group in making those changes, the review team has provided solutions to the issues identified in the plan review. Where possible, in-line edits are suggested, which we hope will be helpful in developing a Final Plan for state recognition. Those in-line edits are included in Attachment 3, which also includes additional suggested improvements. One suggested recommendation of note is a thorough editing of

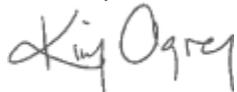
the Final Plan for clarity and readability with an eye towards ensuring the document can be easily understood by readers who are unfamiliar with the plan and planning process. Attachment 4 describes some considerations for implementation.

The Plan Review Team is willing to discuss its review and the required changes, suggested changes, and/or considerations for implementation, in the spirit of looking to the future for the state and planning group to continue to build a partnership as the plan is implemented. This could happen before or after Final Plan adoption by the planning group. Please let me know if this is of interest to you.

Once again, congratulations on reaching this significant milestone. With some attention to the issues identified by the review team and revisions to the plan to remedy those issues, the state agency plan review team will recommend the Final Plan for state recognition by the Oregon Water Resources Commission.

If you have any questions or concerns, please contact me at [Kim.L.Ogren@oregon.gov](mailto:Kim.L.Ogren@oregon.gov) or 503-509-7980 or your Planning Coordinator, Steve Parrett, at [Steve.W.Parrett@oregon.gov](mailto:Steve.W.Parrett@oregon.gov) or 503-586-6287.

Sincerely,



Kim Ogren

Water Resources Development Program Manager

on behalf of the Oregon Water Resources Department and inter-agency review team

Attachments:

1. Strengths of plan
2. Required changes to receive recommendation for state recognition
3. In-line edits to Draft Plan – includes required and suggested changes
4. Considerations for implementation