

Attachment 2 – Required Changes

The changes identified in the table below are those that are required for the Upper Grande Ronde Integrated Water Resources Plan to receive a recommendation from the review team that the Water Resources Commission recognize the plan. The changes are organized by requirement category and question in column 1 (see Appendix B of the Draft Step 5 Guidance for full list of required categories). In addition to the review team finding (column 2), the table lays out a proposed solution (column 3) as well as notes where in Attachment 3 you can find suggested in-line edits to address the issue. In addition to helping secure a recommendation to the Commission that the plan receive state recognition, there are many other benefits to adopting these changes, including 1) demonstrate, document, and memorialize that the plan and planning process followed the Draft Planning Guidelines and IWRS principles, 2) improve appeal to funders, and 3) facilitate and aid implementation.

Requirement Category and Review Question	Review Team Finding	Proposed Solution	Location in Attachment 3
<p>Balanced Representation of Interests Did a balanced representation of interests participate in the development of the plan?</p>	<p>It is not apparent that a balanced representation of interests participated in development and adoption of the Draft Plan. While it appears that many people have been involved in the planning process or received information about the planning, planning group participation appears to be somewhat skewed toward the agricultural sector. The plan appears to give unbalanced attention to out-of-stream water needs. Fourteen of the approximately 25 Governance Agreement signatories voted to adopt the Draft Plan and a majority of them were reportedly from the agricultural sector. It is unclear what groups or organizations represent instream interests and whether/how they were involved in plan adoption as well as their level of support.</p>	<p>For the Final Plan, a broader and balanced group of stakeholders should be involved and express their support for the Final Plan and/or commitment to Plan implementation, in writing if possible. A larger group of the signatories, or all, should be actively encouraged to participate in the vote to adopt the Final Plan. The planning group should consider ways to help people feel comfortable with their plan adoption vote in addition to in person voting. For instance, can people’s votes be anonymous? The Final Plan needs a fuller explanation of how it is balanced and who is on board to support its implementation. If people are non-voting signatories, but support the plan, their support should be captured in the Final Plan or in letters of support if possible.</p>	<p>No redline edits offered. The planning group will need to develop a description in Section 1 of both the Executive Summary and Plan body to address this.</p>
<p>Compliance with State Law Is the Plan in compliance with State Law?</p>	<p>The Plan does not recognize the public interest in water, state authorities and responsibilities, and does not include a link between the place-based plan and the</p>	<p>Include a statement recognizing the public interest in water and state authorities and responsibilities early in the Plan. The Plan</p>	<p>See Pages ES-1, I-1, 1-3</p>

	statewide Integrated Water Resources Strategy.	should reference the IWRS and its guiding principles Suggested language is provided.	See Pages ES-1 and I-1
<p>Understanding Water Resource Supply, Quality, and Ecological Issues</p> <p>Does the Plan document an understanding of the water resources supply, quality, and ecological issues in the planning area for both surface and groundwater?</p>	<p>The Draft Plan does not document a full or accurate understanding of several important aspects of water resources:</p> <ul style="list-style-type: none"> • The groundwater situation is mischaracterized or unclear. • The plan does not describe ecological issues (though they are described in the Step reports). • Water Quality is not adequately addressed and does not reference or acknowledge important key findings from DEQ’s TMDL Report. The TMDL overview is inaccurate. • Characterization of winter water as “surplus” does not recognize the ecological value of these flows. 	<p>The groundwater memo provided by OWRD in 2019 describes the groundwater situation in the basin. Language should be corrected to accurately represent the characterization of groundwater.</p> <p>Include key takeaways about ecological health from the Step 2/3 reports. Some suggested language is provided.</p> <p>Improved water quality language is provided in the Executive Summary and in the section on Surface Water Quality to describe parameters of concern, causes of water quality concerns, and a more accurate overview of the TMDL. Similar clarifications are made in Section 4. The role of ODA in implementing the TMDL on Agricultural lands is described in Section 5.</p> <p>Eliminate the sentence about surplus water and include language recognizing the ecological value of winter water.</p>	<p>See Page 2-15, 4-4</p> <p>See Page 2-16</p> <p>See Pages ES-8, 2-7, 2-8, 2-9, 2-10, 2-11, and 3-3, 4-3 4-4, and 5-4</p> <p>See page 3-10 & Issue/Goal 1, page 4-2</p>
<p>Current and Future Water Needs</p> <p>Does the Plan document the current and future instream and out-of-stream needs of the planning area?</p>	<p>The instream demand section is difficult to understand. The logic of the analysis and conclusions drawn are unclear. The plan does not acknowledge the limitations of WARS as an analysis tool to estimate how often instream rights are met. The characterization of the instream needs is inaccurate or misleading. Oregon Method or BIR instream</p>	<p>Suggested edits are included to clarify several aspects of instream needs and to better characterize the previous flow studies.</p>	<p>See pages, 3-3, 3-6, 3-7, 3-8, 3-9, 3-14</p>

	flow studies are characterized as “obsolete” which is misleading and inaccurate.		
<p>Solutions or Recommended Actions</p> <p>Does the Plan identify integrated solutions to the extent practical?</p> <p>Do the solutions identified adhere to the IWRS Guiding Principles?</p>	<p>The Draft Plan lacks indications of adequate balance and integration of solutions, where practical. The nine solutions/strategies appear to be largely separate and not integrated. The strategies to address flooding speak to moving water out of the area, but lack connection to the storage strategy or to naturally storing water in the headwaters on public lands. It is an instance where an integrated approach to solutions would be preferable.</p> <p>Strategies lack an explanation on how multiple benefits will occur. They appear to be disproportionately focused toward the agricultural sector.</p> <p>The Draft Plan does not identify the path to how instream needs will be determined in those aquatic priority areas currently lacking data, and elsewhere.</p> <p>It is unclear if strategy prioritization considered estimated cost.</p>	<p>At a minimum, describe more fully how the group will consider ways to integrate solutions moving forward. Suggested language is provided in several locations of Sections 4 and 5.</p> <p>State more clearly and obviously whether the intention is to pursue multiple strategies simultaneously and for both instream and out-of-stream purposes in a balanced manner. For example, what are the intended uses of stored water?</p> <p>A two-step process for investigating instream needs is briefly described. Additional edits related to instream data collection, monitoring and research are provided.</p> <p>Expand the explanation of the strategy prioritization process in Section 4 to indicate whether consideration of cost was a factor. If it wasn't, please describe if and when costs will be considered.</p>	<p>See Page 4-1 and 4-2, 5-9</p> <p>No redline edits offered.</p> <p>See Objective 1.2, Pages 4-3 and 5-6.</p> <p>No redline edits offered.</p>
<p>Addresses In-Stream and Out-of-Stream Needs</p>	<p>The Draft Plan appears to focus its solutions heavily toward the agricultural water sector.</p>	<p>The plan needs to improve how the suite of solutions are intended to address both</p>	

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<p>Does the Plan consider current and future instream and out-of-stream needs in a balanced manner?</p>	<p>The municipal water sector appears to have few representatives involved in the planning effort and few strategies for that sector.</p>	<p>instream and out of stream needs in a balanced manner.</p>	
<p>Plan Adoption by Planning Group Does the planning group have a sound process for final review and adoption of the Final Plan?</p>	<p>The explanation of how the review team response to the Draft Plan will be considered and converted into an adopted Final Plan is missing critical information and therefore does not demonstrate that the Final Plan will be adopted with balanced and broad support. The Final Plan should describe an adequate timeframe for review, how stakeholders participated in discussion of changes, and ultimately how the Final Plan adoption occurred.</p>	<p>The planning group should strive for broad support from a diversity of stakeholders and consider ways to have support expressed beyond the adoption vote to demonstrate that a balanced representation of interests support the Final Plan. This will likely require some outreach to stakeholders and community members previously involved but who did not vote or participate in adopting the Draft Plan. The planning group should consider providing a variety of ways for people to participate and vote for adoption of the Final Plan. Participants must be given adequate time to review the drafts and the Final Plan before adoption. Some review periods of previous drafts have been inadequate for agency partners. The Final Plan should explain what efforts are made to achieve broad support of the Final Plan.</p>	<p>No redline edits offered.</p>