## Modifications Required by the State Agency Plan Review Team

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| **Requirement Category and Review Question** | **Review Team Finding** | **Proposed Solution** | **Location in Draft Plan** | **Proposal** | **Draft Language and Location in Plan** |
| **Current and Future Water Needs** | The Draft Plan does not adequately describe cultural issues or concerns related to water resources, though it is briefly mentioned. Do the Siletz Tribes have a plan or strategy for protecting or restoring water related to fishing in the streams or estuaries? | The plan should describe how the Siletz Tribes have used aquatic resources in the planning area, current activities related to those interests such as ownership, restoration programs, and protection of significant cultural fishing sites. The PRT recommends this information be summarized in the Basin Overview section to provide context to the planning effort. | Recommended that this be included in the “General Overview” and/or “Overview of Instream Water Uses and Needs”, page 30 of the 12-15-21 draft.  This is the only statement currently in the plan (page 24 of 12-15-21 draft) that discusses what the Tribe does with natural resources in the basin, “The Siletz Tribes has an established water quality monitoring program.” | * Call Stan van de Wetering to vet proposal. Describe participation and engagement with the CTSI, including some results from OKT engagement. Use information from existing websites to describe cultural and natural resources pertaining to water.   <https://www.ctsi.nsn.us/introduction/>  <https://www.ctsi.nsn.us/fish-wildlife/>  <https://www.ctsi.nsn.us/other-natural-resources-programs/>   * In the plan commit to following up with the tribe during implementation to further discuss and assess their values and priorities as they relate to water resources. * Feedback to OWRD: Description of tribal interests is not called out specifically in the Guidelines, any of the guidance, or example template. Please make this more explicit in the Guidelines and Guidance to ensure consideration and adherence for future processes. Guidelines Pg. 9 – “This step of the planning process is also an opportunity to tell the story of what makes the area unique, describing the economic, social, cultural, and landscape characteristics of the community.” * In a follow up meeting with OWRD on 3-31-22 Alexandria asked them what they were looking for specifically and they said under 3 paragraphs what plans do they have around water in the basin and what actions do they support. | * Referenced that the Partnership has given 4 - 5 presentations to the Siletz Tribal Council, Stan has participated on the Coordinating Committee to make sure the Tribe’s interests and concerns are reflected in the process, 2019 Partnership meeting hosted by the Tribe and opening remarks from Vice-Chairman Bud Lane on page 4 (see track changes) of May 2022 draft plan. * The statement “During the regional plan adoption phase, the Partnership will reach out to the Siletz Tribal Council to further discuss and assess their values and priorities as they relate to water resources” was added on page 6 of the May 2022 draft plan (see track changes). * Under the “Perceptions and Values of Mid-Coast Regional Stakeholders” section discussed that the responses to the Oregon’s Kitchen Table community surveys doubled from phase 1 to phase 2 and that they Partnership worked together with the Tribal Council for both projects, see existing text on page 14 and new text on pages 15 – 16 of the May 2022 draft. * Under the “Tribal Nations” sub-section of the “General Overview” section on page 17 (see track changes) of the May 2022 draft see new language. This information was obtained by interviewing Stan about the Tribe’s natural resource restoration efforts and water conservation efforts. |
| **Current and Future Water Needs** | Draft Plan does not adequately describe current instream demands to the extent known. | The plan should contain a summary of the instream analysis that was done and is mentioned in the draft plan. This could be accomplished by pulling summary information from past reports/work. | Recommended this be included in the “Current and Future Instream Water Needs for Fish and Wildlife” section, page 33 of 12-15-21 draft. | * Called ODFW and ask what sections of the OWRD technical memo should be pulled into the final plan. The Partnership needs more guidance and direction from ODFW about what information to include. * Refer to the language in the Planning Guidelines (Pg. 11):   “Describe existing instream needs in the planning area to determine if such needs are currently being met. Consider existing protections (e.g., instream water rights, pending instream water right applications, scenic waterway flows, or flows specified in project operations) to support fish, wildlife, recreation, or pollution abatement. Also assess flow needs to support other uses, such as navigation or hydropower. Groundwater often contributes flow to surface water bodies and supports various ecological functions; therefore, groundwater should be considered for assessing instream needs. Determine how often instream flows are met in wet or dry years and the likelihood such flows will be met in the future. Refer to the Integrated Water Resources Strategy for more information on the suite of flows that are needed to support instream uses.”   * The Partnership recognizes that priority areas are not currently specified in the plan. As a first step in implementation, the Partnership would like to work with ODFW to identify and document priority areas and actions for streamflow restoration efforts. * Feedback to OWRD: While the Guidelines do include information to include about instream demands, the Partnership lacked the technical expertise to perform some of these analyses and relied on the information that was provided by OWRD and ODFW. The Partnership is constrained by its technical capacity and only has at its disposal information that was pulled together by agency partners. More assistance and guidance should be provided in the future to allow for specific technical analyses to be performed. * Alexandria worked with ODFW to come up with a proposal to address this. | * See “Current and Future Instream Water Needs for Fish and Wildlife” section of the May 2022 draft plan (see track changes) on pages 37 – 39 for revised language. |
| **Understanding Water Resource Supply, Quality, and Ecological Issues**  Does the Plan document an understanding of the water resources supply, quality, and ecological issues in the planning area for both surface and groundwater? | The Draft Plan lacks sufficient detail about the status of current surface water quantity, particularly concerning current instream supplies or flow in streams. | The plan should include a summary of the status of current surface water quantity. OWRD produced two memos on surface supply and demand that are a good source of information. Summary information from those memos could be pulled into the plan. | Recommended that this be included in the “Understanding Water Resources Quantity, Quality, and Ecological Issues” section | * Feedback to OWRD: The guidelines do not include much information about what should be included to describe surface water quantity and the Department does not have guidance for Step 2. In the Step 5 template it only states “water resource supply” as a section of the plan, but does not include much detail about what should be contained in that section. The Partnership needs more guidance and direction from the Department on this before we can proceed. * A few meetings were set up with OWRD and ODFW to ask what sections of the OWRD technical memo or Step 2 reports should be pulled into the final plan. * OWRD’s feedback at a meeting on 3-31-22 the plan is lacking the current status of surface water and current flows relative to the instream needs. * Alexandria worked collaboratively with ODFW to incorporate language that satisfied their concern with regards to information on instream supplies. | * See “Ecological Values and Instream Water Rights” section of the May 2022 draft (see track changes) on pages 35 – 37 for revised language. * See Overview Out-of-Stream Water Uses, Needs and Challenges” section page 40 – 43 for revised language (see track changes). * See “Water Availability and Future Needs” section of May 2022 draft plan on pages 49 – 51 (see track changes) for revised language. * “Appendix I. Water Use and Availability Summaries by Sub-Area” was added to the May 2022 draft plan see pages 122 – 137 (look at track changes). |
| **Understanding Water Resource Supply, Quality, and Ecological Issues** | The Draft Plan lacks sufficient detail about the groundwater situation The groundwater information in the draft plan is dispersed and is not easily located making it difficult for the reader to get a sense of the understanding of groundwater supply. A new reader may not understand why groundwater is not a solution. | Previous groundwater work done by OWRD would be a good source of information and summary information could be added to the plan under the Water Quantity Section. One option is to add a short, dedicated section on groundwater to include an overview of geology, characteristics of the aquifers, productivity of the groundwater source. | Water Quantity pages 18 -19 of 12-15-21 draft. | * Alexandria followed up with OWRD on 3-31-22 to get clarification on what they needed to know. They said it is not clear in the plan why groundwater wouldn’t be an obvious solution. * A short section on Groundwater Quantity will be added drawing from information generated in Steps 2 and 3. This Groundwater section was created in collaboration with OWRD. | * See “Groundwater Quantity” section on pages 22 -24 of the May 2022 draft plan (see track changes). New Image added to the plan as well here figure 8 Photograph of the Tyee formation. Photo Credit: Stanford Project on Deepwater Depositional Systems (<https://spodds.stanford.edu/tyee-basin-oregon>). * See “Groundwater Use and Development” section of the May 2022 draft plan on page 51 (see track changes) for new language. |
| **Solutions or Recommended Actions**  Do the solutions identified adhere to the IWRS Guiding Principles? | The draft plan does not identify if cost was a consideration during prioritization of actions, which is an IWRS Guiding principle. Also, it is unclear how the cost figures for various actions were developed and to what degree of accuracy or reliability are those figures. | The plan should either describe if cost was considered during prioritization. If it wasn’t, please describe when costs will be considered. It would be helpful to describe what the reader should make of the cost figures included in the plan. | Suggested to include in Overview of the Strategic Action Imperatives, page 48 and/or 51 of 12-15-21 draft. | * Cost was not a consideration during prioritization of actions. The cost figures were developed by seeking voluntary input from participating members and was not vetted or independently verified. Further work needs to be done by the Partnership to examine the cost and feasibility of various actions and use those to refine priorities. * Alexandria followed up with OWRD on 3-31-22 to see what they wanted to know regarding cost. They said they wanted to when is cost going to be considered? How is the Partnership considering this? Brief. | * See yellow card solution discussing cost on pages ix – x of May 2022 draft (see track changes) * Also see “Funding and Investments” imperative on page 58 (see track changes) for revised language * See “Prioritizing Actions” section on pages 61 – 62 (see track changes) for revised language |
| **Plan Adoption by Planning Group**  Does the planning group have a sound process for final review and adoption of the Final Plan? | The Draft Plan does not describe how feedback from the public and the PRT will be incorporated into the Final Plan or the amount of time for partner review of the Final Plan prior to adoption. The Final Plan should describe the process that was used to get from Draft Plan to Final Plan. | The PRT would like to discuss this with the Mid-Coast Partnership so we understand how this will happen and would like the pathway to be documented in the plan so there is a clear understanding among partners and a reference for what happened in the final plan.  Discuss and document by e-mail. | Could include on page 5 of 12-15-21 draft. | * Describe the public review period for the plan and how comments were addressed and include them as an attachment or appendices. * Alexandria will work with agency partners to craft agreed upon language that will be taken to the Partnership for final consensus of all charter signatories consistent with the terms of the Governance Agreement. The partners consenting to final adoption of the plan will be documented along with their affiliation to ensure a balanced representation of interests were included. Any dissenting opinions will be documented consistent with the terms of the Governance Agreement. * If the plan is recognized by the State, the Partnership will work with local partners to sign Declarations of Cooperation that clarify partner commitments to implementation. Where appropriate, the Partnership will also work with local governments to craft resolutions for plan adoption that will be taken to local boards and commissions for approval. These next steps will depend on Partnership capacity. | * A statement was added under the “Plan Adoption and State Recognition” section on pages 5 – 6 of the May 2022 draft plan (see track changes) to elaborate on the processes that informed the May 2022 version of the Mid-Coast Water Action Plan. This includes the state review process, 12-15-21 charter signatory yellow card solutions and consensus vote, 30-day public review and next steps to receive state recognition and locally adopt the plan. * The following appendices: Appendices J: State Plan Review Team Feedback, Feedback from Charter Signatories, Compiled 30-Day Public Review Feedback That Informed May 2022 Version was added to the plan so that the public and our partners can see what efforts were made to reach the final plan that the Partnership will be adopting and presenting to the Water Resource Commission in June. * The only change to the plan that resulted from the 30-day public review process was that the Sankey diagram (fig.7) of the 12-15-21 version of the plan was swapped out for a new Sankey diagram (still fig.7 now on page 22) that shows the total estimated average annual natural streamflow volume (in acre-feet) of surface water in streams and rivers in the Mid-Coast based on a 1958-1987 period of record. This is a more accurate depiction than the previously used figure. * See pages 63 – 64 of the May 2022 draft plan (see track changes) for Oregon’s Kitchen table Phase 2 findings that reflect where the community thinks the Partnership should focus its efforts in the first 2-years of plan implementation. |

## Modifications Required by Charter Signatories to Meet Yellow Card Concerns from 12/15/21 Meeting

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| **Requirement Category and Review Question** | **Review Team Finding** | **Proposed Solution** | **Location in Draft Plan** | **Proposal** | **Draft Language and Location in Plan** |
| **Budget Estimates** | *Alan Fujishin (Gibson Farms)*  Concerned that the budget estimates presented did not consider the full range of potential strategies and projects that might be pursued by Partners, or accurately reflect the specified objectives if pursued by either a likely subset or the full range of partners from their respective positions. The imposed "sticker shock" of these estimates as presented may lead readers to dismiss collaborative water action as prohibitively expensive offhand rather than motivate readers to consider how they might cooperate toward addressing achievable portions of the Plan within their means and capacities. | There was agreement amongst the Signatories that the budget numbers are not citable and may be economically skewed over time. A balancing statement in the executive summary that acknowledges that there is a wide range of potential costs associated with implementing any of these actions, because they are not specked out at the individual project level in this plan was supported. It was also suggested to include something in this statement about the benefits of investing in ecosystem services, not just as out of pocket costs. | In the 12-15-21 draft plan this was page x (part of executive summary) | * It was agreed upon by the Signatories to pull the budget breakdown from the executive summary but to leave the estimated range of the total budget in the executive summary for funders and partners to reference. * The group agreed to leave the budget numbers in the Implementation Table, if the name was changed from “Budget” to “Initial Estimates of Need” or similar language. * David Waltz and Mike Broili volunteered to help craft the balancing statement to include in the executive summary. Alexandria had 1 meeting with them to discuss ideas on how to approach this and then they worked offline using a strawman statement provided by David Waltz. * The final draft statement from Alexandria, David and Mike was sent to Alan for feedback/edits and his proposed language is what is included in the May 2022 iteration of plan. | * For balancing statement see page ix - x of the May 2022 draft (check track changes) * Under the “Anatomy of the Mid-Coast Water Action Implementation Table” Section on page 64 the words “Estimated cost to implement the action” were changed to “Initial Estimated Investment: Preliminary estimated costs to implement the plan over 10 years”. Footnote 28 corresponding to this section of the table was also changed to match this language. * The column titled “Budget” in the Implementation Table was changed to “Initial Estimated Investment” |
| **Lacks statement that actions have not been reviewed under statewide planning goals and local land use ordinances** | *Lisa Phipps (DLCD)* submitted a green card but wanted to see a statement in the introductory piece that says that these actions have not been reviewed under the lens of the statewide planning goals and local land use ordinances. As a result, as actions are initiated, they may either be allowed, modified, or prohibited based upon land use reviews. | The group agreed a positive statement could be made to highlight. It was suggested that many of the water and land-use related actions may have several regulatory steps that have to be followed to be implemented, so broadening the language could be beneficial for partners looking at this document. | Not currently in the draft plan the group proposed it could be added to page 54 before the Implementation Table. | * Joe Moll, Alan Fujishin and Lisa Phipps volunteered to assist with crafting this statement. Alexandria had 1 meeting with Lisa and Joe to discuss what to include in the statement. Joe crafted an initial statement, and then Lisa and Alan made changes. Lisa felt that the statement that culminated from their work satisfied. | * For this statement see page 57 of the May 2022 draft (see track changes) directly under the “Overview of the Strategic Action Imperatives” title. |
| **Issue with Step 3 Summaries** | *Alan Fujishin (Gibson Farms)* Disappointed with how these were summarized in several cases. Edits submitted range from stylistic ones to correcting some factual inaccuracies presented regarding how water is administered in OR and the Planning Area. | Alan submitted a Step 3 markup on 12/15/21 for consideration of the group but the group did not have sufficient time to review the proposed edits. At the request of the group Alexandria sent them the markup to consider before plan is finalized. | Pages 30 – 46 of 12-15-21 draft plan | * Alexandria reviewed the feedback/edits submitted by Alan and found them to be additive and clarifying. His edits were also sent to a few members of the Plan Review Team and there were no objections to the proposed edits. | * Alan’s Step 3 proposed edits were combined with edits produced in collaboration with ODFW and OWRD to clarify Water Uses and Needs in the Mid-Coast on pages 34 – 50 of the May 2022 draft plan (see track changes). These changes help to satisfy the required improvement for more information on instream needs and uses. |
| **Outreach Efforts Elaboration** | *Steve Parrett (OWRD)*  The plan identifies some user groups such as industrial self-supplied, farmers, and community water systems who are important, but were not able to adequately participate in the planning process. The plan should include an explanation about efforts taken to reach those people, challenges you faced, and how you will try to engage them during future work. | Help people understand that the plan was developed with a balanced representation of interests, to the extent possible, and that you made a good-faith effort to reach them. Alexandria said she would put together a few sentences to describe this for the reader. | Suggested this be added to the “Balanced Representation” section on pages 4 – 5 of 12-15-21 draft plan | * Alexandria referenced previous work done the Partnership as well as things she has done in Planning Coordinator role for the Partnership to highlight what outreach efforts have been done during this 6-year planning process. | * Alexandria added that the Partnership has done radio broadcasts to talk about the work of the collaborative to page 4 of the May 2022 draft plan. * Alexandria added the statement “Mid-Coast Water Planning Partners have made a commitment to diversity, equity, and inclusion throughout the planning process recognizing that capacity can be a barrier to high-level participation,” under the balanced representation section on page 5 of the May 2022 draft plan. * Alexandria added language to highlight CTSI Community involvement in the planning process (hosted September 2019 Partnership meeting, requests for presentations at Siletz Tribal Council meetings, participation from CTSI members in the OKT Phase 1 and 2 community engagement projects, participation on the Coordinating Committee). This language can be found of page 5 – 8, 15 – 17. * The OKT community engagement project overview also highlights Latinx and Spanish speaking community member outreach efforts. |
| **State’s Role & Authority for Water Management** | *Steve Parrett (OWRD)*  The plan should recognize the state’s role and authority for water management. | Steve said the state would provide language for this. | Was not specified. | * Get the language and where it should be located (page and placing) from Steve & Kim (OWRD). * Alexandria and Adam had a meeting on 3-31-22 to follow up on this feedback since it did not come back as a required improvement from the state plan review team. They clarified that the plan review team collectively felt that the plan actually did satisfy recognizing the state’s role and authority for water management**.** | * **No change necessary to plan.** |
| **Clarification on Sources Cited** | *Steve Parrett (OWRD)*  Some sources of information in the draft plan are not cited, so it is hard to know the validity of that information or if it was the writer’s opinion, etc. Additional citations should be made in a number of places. | The Partnership’s Planning Coordinator has asked the Department during the state agency review to track change where they see this in the document. | Was not specified. | * Alexandria followed up with OWRD on this feedback on 3-31-22 to see if they still had this concern after the state plan review process. Because this is a pilot program, the plans look very different than what the Department is used to looking at, but once they saw other plans (Upper Grande Ronde & Lower John Day) they realized that many of the references in the document are from previous planning steps. The plan review team feltthat this was not a big issue that needed to be addressed. | * Appendix B (page 100 -106) was changed to briefly describe all of the processes, products and participants in Planning Steps 1,2,3,4. This appendix originally on contained the Step 2 reports. * Additional footnoted hyperlinks were added, and the Literature Cited page (pages 92 – 93) was updated to more accurately depict the information contained in the plan. |