

2024 IWRS Draft 1 Public Comment & Agency Responses - April, 2024

1. Anton Chiono – Confederated Tribes of the Umatilla Indian Reservation, Dept of Natural Resources
2. Bridget Moran – U.S. Fish and Wildlife Service
3. Chris Hall – Water League
4. Christina Witham – Baker County
5. Cliff Mitchell
6. David Hohler
7. Dean Runyan – WaterWatch of Oregon
8. Don Coats
9. Doug Heiken – Oregon Wild
10. Edward Wolfe
11. Evan Neyland
12. Evan Neyland
13. Gary Young
14. Genny Bond
15. Gloria and Bob Ziller
16. Harmony Burright
17. Jan Lee-Weinberg – Water Resources Commissioner
18. Jean Edwards
19. Jeffry Gottfried
20. Jerry Linder – Oregon Association of Clean Water Agencies
21. John DeVoe
22. Kathleen Samsel
23. Kimberley Priestley – WaterWatch of Oregon
24. Laurel Hines
25. Leslie Bach
26. Mark Rogers – Oregon Council Trout Unlimited
27. Mark Scantlebury
28. Mary Lou Soscia
29. Matt Stouder – Metropolitan Wastewater Management Commission
30. Merry Ann Moore
31. Myron Redford
32. Nancy Nichols
33. Nathan Gehres – Applegate Partnership and Watershed Council
34. Oregon Water Partnership
35. Paul Riedmiller
36. Penelope Kaczmarek – Lincoln County Water Systems Alliance
37. Rebecca Geisen – Portland Water Bureau
38. Rian vanden Hooff – Oregon Department of Environmental Quality, Water Program
39. Rick and Lindsey Noss
40. Robert Bernstein
41. Robert Davidson
42. Stan Dean – Oregon Association of Conservation Districts
43. Susan Smith
44. Susan Murbach
45. Susan Fouty

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Public Comment Period March 5 to April 5, 2024				
ID	Name/Organization	IWRS Topic	Comment	Agency Response
1	Anton Chiono, Confederated Tribes of the Umatilla Indian Reservation, Department of Natural Resources		Letter from March 7, 2024	Note: comments in this letter refer to an early draft of action summaries provided for Tribal review and not the public review Draft 1 (see letter below).
			The Confederated Tribes of the Umatilla Indian Reservation Department of Natural Resources (CTUIR DNR) appreciates the opportunity to comment on the proposed update to Oregon’s Integrated Water Resources Strategy (IWRS). We participated closely in the development of the original IWRS and its subsequent update in 2017. While we understand that listening sessions were held on this most recent revision, we unfortunately did not have an opportunity to participate in this process before now.	Thank you for your comment.
			Upon completion of the 2017 IWRS update, we felt that the document provided clear direction and a firm foundation for tackling the difficult water management issues facing Oregon, particularly with respect to restoring and protecting instream flows. Water and salmon are two of the Tribes’ most culturally important “First Foods”, and healthy, flowing streams are critical to providing cold, clean water and harvestable fisheries. Although much progress remains to be made in restoring Oregon’s river ecosystems, we were confident that the 2017 IWRS update provided a firm foundation for doing so.	Thank you for your comment.
		Structure	While we commend and wholeheartedly endorse the inclusion of updated climate and equity components in the IWRS, we are somewhat perplexed by the proposed revisions and what appears to be a wholesale restructuring of the 2017 version. We understand that an update is required every five years by statute, but this does not mean that the preceding version must be completely rewritten. Indeed, we fear that, in these proposed changes, much of the original intent is lost from the original 2009 legislation directing the creation of the IWRS, particularly with respect to understanding and meeting instream and out-of-stream needs. By drastically restructuring and rewriting the 2017 version, we are concerned that OWRD may be “fixing” a problem that does not actually exist. However, in this “fix,” we fear that a very real problem may be created.	The statutory objectives have been carried forward to the 2024 draft. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies.
			Rather, we suggest that the goal of making the IWRS more accessible to the general public be met through outreach and education to explain the objectives of the IWRS. This outreach should include progress reporting that is presented in ways that are approachable by the general public.	Thank you for your comment.
			We thank you for your consideration of these comments and provide our specific thoughts on the <u>proposed revisions in the following pages</u> .	Thank you for your comment.
			Specific Comments on Proposed 2024 IWRS Revision	
			Chapter 1 In the 2017 version of the IWRS Update, one of the “Critical Issues” included in Chapter 1 is to “Improve Water Quality and Water Quantity Information.” It appears that the proposed 2024 revisions have changed this to simply “Funding”. While funding is undoubtedly an important component of any water management strategy, this does not seem like an appropriate replacement for better understanding water quality and water quantity, which is the fundamental first step to improving water management. It is unclear why this was changed from the 2017 version, which seemed quite logical in terms of both substance and sequence in its focus on first understanding water quality and quantity.	Objectives and critical issues have not been eliminated. Funding previously existed as actions under objective #4 (at the end of the 2017 IWRS) and was moved to the beginning of the Strategy actions. IWRS public and agency engagement, the Secretary of State Report 2023-04, the 100-Year Water Vision, all emphasized the current lack of funding for addressing our instream and out-of-stream needs. All actions to improve water quality and quantity information remain, they are found in Chapter 3, Data & Analysis. The draft 2024 Framework provides the 2017 IWRS action numbers in parentheses to help compare the old with the new.
			Further, the removal of specific guidance from the proposed revision is concerning. The explicit “Recommended Actions” given by the 2017 version provide much clearer direction as to the steps necessary to address Oregon’s water resources management challenges. For instance, understanding groundwater is a key part of sustainable water management, and this has been tremendously important in the basins within CTUIR’s aboriginal areas, particularly the Umatilla Basin and the Walla Walla Basin. It is unclear why this clear and critical objective would be removed in favor of such a general heading that appears to provide very little specific guidance.	This action calling for more groundwater studies was not removed. Action 1A in the 2017 IWRS is now Action 7B in the 2024 Draft 1. The 2024 draft Framework shows all of the new action numbers as well as the 2017 action numbers in brackets.
			A similar concern arises with respect to Action 1B (“Fund Water Resources Management Activities at State Agencies”) in the proposed revision. The 2017 IWRS update provides clear direction as to the needs addressed under Action 1B and provides a series of examples of how this action would be implemented. Without fail, a lack of data is one of the largest obstacles we encounter when attempting to promote sustainable water management across the state. These needs are too important to not be explicitly stated and it is troubling to see them lost in the very general wording of the proposed revision. We feel the clear examples provided in the 2017 update provide much more direct guidance as to the specific actions the State of Oregon needs to implement. We would strongly advocate for such specificity to remain.	The lack of data is real and significant, which is why a chapter heading "Data & Analysis" has been added to help the reader quickly see all of the data related actions. The Objectives associated with the actions remain the same. The IWRS project team is working on revisions to the Framework to help clarify this.
			We also question the changed direction in Action 1C (“Invest in Planning, Feasibility Studies, and Water Resource Project Implementation”), which in the 2017 IWRS update stressed data collection and processing across agencies and the use of this information in decision making. In other words, the 2017 version underscored the importance of data-driven decision making, which is how any type of management must proceed if it hopes to be successful. While planning and feasibility studies are important, they do not rise to the same level as ensuring that high-quality, foundational data exist for decision making. The pivot to planning and implementation in the proposed revision is concerning, particularly when it appears to come at the expense of ensuring the collection and use of foundational data—which, as mentioned previously, has been the single biggest obstacle to sustainable water management in the areas where we work. Indeed, the Umatilla Tribes have had to work with USGS to install and operate multiple stream gages in our geography to ensure that the State of Oregon’s instream water rights are managed and enforced. Rather than planning and implementation, we strongly encourage action 1C to focus on data collection, as it did in the 2017 version.	The 2024 Draft Framework shows the new action number and the 2017 IWRS action number in brackets to show where actions have been relocated.
			Chapter 2 It is not clear as to why Chapter 2 appears to have been changed so considerably from the last IWRS update, starting with the proposed revision of the chapter’s title. We felt that the 2017 version clearly and plainly defined the tasks outlined in Chapter 2: “Understand Instream and Out-of-Stream Needs.” We are uncertain as to why this fundamental need would be removed from the 2017 IWRS—particularly when “Partnerships & Planning” is what is being proposed to replace it. While we appreciate that OWRD is attempting to make the IWRS more accessible to the general public, we fear that the proposed changes to Chapter 2 risk blurring the separation between the IWRS goals and the steps necessary to achieve these goals. Partnerships and planning are important means to achieving the ends of sustainable water management, but they should not be the ends unto themselves.	The actions associated with 2017 IWRS objective "Understand Instream and Out-of-Stream Needs" have not been removed from the 2024 draft, simply moved to Chapter 3. IWRS public and agency engagement, the Secretary of State Report 2023-04, the 100-Year Water Vision, all emphasized the need for better coordination, collaboration, and planning to addressing our instream and out-of-stream needs. Data is not useful in isolation, strong partnerships for collecting and sharing data are needed. Planning efforts help identify additional data and analysis needs.
			Again, the proposed revision’s diminished emphasis on data is concerning. Actions like partnership and planning are fundamentally different from ensuring that the core data exist to allow for informed decision making. It is unclear why these two actions, which are only two among many, are being elevated in this proposed revision. Certainly, the Umatilla Tribes are committed to partnerships and planning—but neither of these can succeed without a clear understanding of water demands, both instream and out of stream. We would strongly encourage the agency to retain the original Chapter 2 from the 2017 IWRS.	Data actions have not been removed from the IWRS, they can all be found in Chapter 3, Data & Analysis. The capacity to collect data is finite and can benefit from partnerships to identify the most critical data needs. Partnerships and planning inform data needs and data likewise informs planning.
			Consistent with our comments on Chapter 1, the proposed revisions on Chapter 2 seem to follow a trend of replacing clear, specific steps and recommendations from the 2017 IWRS with more generalized actions, many of which seem largely out of sequence. Rather than the necessary steps to quantify water demands that are in the 2017 IWRS update, the proposed revision replaces them with more generic actions related to outreach, coordination, and planning. It is troubling that these specific steps related to data are being proposed for removal, and it is also concerning that they are potentially being replaced by actions such as planning and outreach.	The 2024 Draft IWRS actions are the same actions (not more or less general) than the 2017 actions, they are simply located in Chapter 2 rather than in 2017 IWRS Chapter 3. There is only one new action in the 2024 Draft Chapter 2, which is to "Lead Meaningful Community Engagement" an action that addresses major equity concerns for underserved communities to engage in water decision-making processes.

	<p>Chapter 3 We are pleased to see the emphasis on data in Chapter 3, but fear that the proposed restructuring of the chapter sacrifices clarity and urgency when compared to the 2017 IWRS update. This again seems to follow a broader trend in the proposed revisions that generalizes the specific details of earlier IWRS iterations. While a balance certainly must be struck, we find that Chapter 3 from the 2017 IWRS update is much clearer as to the goals of the chapter and the problems it seeks to address. We are encouraged to see a focus on quantifying instream and out-of-stream demand in this chapter, but we strongly disagree with seeing these components demoted to mere sections in a broader chapter entitled "Data & Analysis." This is particularly inappropriate when "Partnerships & Planning" is being proposed for elevation to its own chapter at the expense of an emphasis on quantifying water demands. As stated in our earlier discussion of the other chapters, we do not feel that this proposed change in organization improves upon the 2017 IWRS; rather, we fear the opposite may be true. Understanding water demands is foundational and should remain the subject of its own chapter.</p>	Thank you for your comment.
	<p>Chapter 4 Again, we are concerned that the overall trend toward generalization in these proposed revisions compromises clarity and creates ambiguity as to priorities. This issue is apparent again in the re-naming of Chapter 4 in the proposed revisions. In the 2017 IWRS update, Chapter 4 was entitled "Meet Oregon's Instream and Out-of-Stream Needs." This clearly articulated the objectives of the chapter and the recommendations included therein. The proposed change of this chapter's name to merely "Stewardship" creates ambiguity and, we fear, deprioritizes the original intent of this chapter, namely the objective to meet instream needs. "Stewardship" is a term that can mean multiple things to multiple people; we therefore feel its use is not appropriate for a chapter that should have the clear instream objectives and strategies that were contained in the 2017 IWRS.</p>	The objective associated with all actions in the Stewardship chapter remain to "Meet Oregon's Instream and Out-of-Stream Needs," as shown on the 2024 IWRS Draft Framework. The Framework proposed for Draft 2 will clarify the connections between chapters and objectives.
	<p>Further, we again note a puzzling emphasis on partnerships and planning in the proposed revisions for this chapter. While these undoubtedly are important strategies for water management, these should not overshadow the critical importance of the applicable statute and regulation that guide water management in the state. The Tribes have participated in many collaborative water planning efforts in both Oregon and Washington State, including Place-Based Planning in the Upper Grande Ronde and Lower John Day basins. While local partnerships are important, these efforts must not come at the expense of working within relevant agency missions and applicable rule and statute. Where we have seen these planning efforts fail time and again is where state agencies have been passive or absent altogether.</p>	The critical issue "Place-based Efforts" and associated actions have been moved from the 2017 IWRS Chapter 4 to the 2024 IWRS Chapter 2. There have not been additional partnership or planning actions added to Chapter 4, they continue to focus on the objective to "Meet Oregon's Instream and Out-of-Stream Needs"
	<p>Indeed, one of the greatest challenges we experienced in working with the Place-Based Planning basins was resolving the tension between the local planning groups' desires and the bounds of what was legally permissible within the state's regulatory framework. We are concerned that by emphasizing partnerships and planning we risk implicitly minimizing the importance of working within applicable rule and statute. This may create false expectations and potentially exacerbate the challenges we already are experiencing when working on water management issues with local stakeholders. We fear that the emphasis on planning and partnerships in Chapter 4, and throughout the proposed revisions, may risk minimizing the importance of the broader framework of water law, policy, regulation, and the overall missions of our natural resource management agencies.</p>	The full draft of the 2024 outlines the legal framework for water in Oregon, setting the stage for the actions in the Strategy. The need for stronger partnerships (not exclusive to Place-Based Planning) continues to be a critical factor in addressing big water challenges. State and local partnerships have been critical in accomplishing watershed restoration projects throughout Oregon. The Klamath dam removal project would not have been possible without enduring commitment from many different partners.
	<p>Summary While we understand that an update of the IWRS is required every five years, we urge OWRD to not approach this update as if the preceding version needs to be discarded. The 2017 IWRS provides a strong foundation and clear guidance for improving water management in the State of Oregon. We do feel it could be improved in terms of climate change data and equity considerations, and it is in this respect that we would encourage you to focus your update. We do not think that the wholesale restructuring and revision of the IWRS as proposed is warranted or advisable. To OWRD's goals of improving the accessibility of the IWRS to the general public, we suggest that is better achieved through outreach, education, and thoughtful progress reporting, rather than de-emphasizing the clear goals that Oregon's agencies would pursue through the IWRS.</p>	The Secretary of State Report 2023-04 documents some of the ways the 2017 IWRS is not currently meeting the states water planning needs. Changes proposed for the 2024 draft have been in service to improving equity and accountability, while not discarding the original actions, goals, or objectives. While education and outreach regarding the IWRS will continue to be needed, document accessibility (including for staff for 15+ agencies) continues to be an important goal.
	<p>Letter From April 5, 2024</p>	
	<p>Since its creation, the IWRS has been critical to furthering the understanding of Oregon's surface water and groundwater and promoting a more-sustainable management of these precious resources. It has been essential in providing both specific guidance to resource management agencies as well as a legislative impetus to better fund these agencies to accomplish the IWRS goals. For instance, the explicit direction given to Oregon Department of Fish & Wildlife (ODFW) to apply for instream water rights has been critical to preventing even further degradation of our rivers and streams across the state.</p>	Thank you for your comment.
	<p>Given all this, CTUIR long has been a strong advocate for the IWRS and its emphasis on data, science, and the protection of instream flows. We engaged closely in the creation of the IWRS authorizing language codified under ORS § 536.220, the development of the original IWRS itself, and its subsequent update in 2017. We submitted comments, which are attached, on the one-page summaries of the 2024 revision during the comment period afforded to Tribes earlier this year. Now that we have had the opportunity to review the complete draft of the proposed revision, we would like to provide additional thoughts during this initial public comment period.</p>	Please note that the comments provided on the 1-pagers were received after the public comment period had opened for Draft 1 and are therefore included, above.
Restructure	<p>In considering the draft 2024 update, we think it is instructive to first revisit the direction given by the IWRS authorizing law, ORS § 536.220. With this statutory guidance in mind, it is striking how much of the preceding 2017 IWRS framework and content has been abandoned, particularly given that ORS § 536.220(3)(e) specifies that the Water Resources Commission only "review and update" the IWRS at least once every five years. Certainly, the proposed wholesale replacement of the previous IWRS appears to be more than simply the review and update contemplated by statute. If there were strong public sentiment for such a substantive overhaul, then perhaps such a course would be merited. But, absent that, such a drastic approach seems perplexing, particularly given that only now has there been an opportunity for the public to weigh in on the specific changes proposed.</p>	The WRC determined that the re-organization was appropriate in scale. To reiterate, 2017 IWRS actions remain and have been updated where needed to reflect current needs. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. All WRC meetings were open to public comment.
	<p>We also note that the proposed draft seems incongruous with ORS 536.220 beyond just the scope of the update. In particular, ORS § 536.220(d)(A) specifically directs the IWRS to describe "Oregon's instream and out-of-stream water needs, including but not limited to ecosystem services, water quality and water supply needs." This is the foremost requirement of the IWRS as given by statute. With that in mind, we again question the removal of a chapter entitled "Understand Instream and Out-of-Stream Needs" from the 2017 version and its replacement with a chapter entitled "Partnerships & Planning" in the proposed 2024 draft.</p>	The narrative and actions from 2017 Chapter 2 "Understand Instream and Out-of-Stream Needs" is now located in the 2024 draft Chapter 3.
Primacy of Partnerships	<p>While partnerships indeed are mentioned in statute, the direction given under ORS § 536.220(d)(E) is for the IWRS to describe "provisions to ensure communication and partnership with key stakeholders". Given this, we would question the primacy the proposed draft seems to have given partnerships over understanding instream and out-of-stream needs. We feel that the explicit emphasis the 2017 IWRS gives to understanding instream and out-of-stream needs is much more consistent with statutory guidance.</p>	The name of Chapter 2 "Partnerships & Planning" groups together the many 2017 actions that address partnering and planning that are grouped together under the 2017 Objective "Understand the Coming Pressures that Affect our Needs and Supplies." There is only one new action in this chapter "3C Lead Meaningful Community Engagement." Revisions to the framework will clarify this.
Goals of 2024 revision	<p>In OWRD's outreach on the IWRS revision, we have heard that simplification, greater public accessibility, and the advancement of "Oregon's 100-Year Water Vision" ("Water Vision") are all goals of this 2024 revision. While perhaps all admirable goals, we are not aware of any legislative or executive guidance dictating as much. We would like to better understand why these objectives were given such precedence in the 2024 IWRS revision. We also question the motivation of simplifying the document to create greater accessibility for the general public when the primary users of the IWRS should be agencies with trained professionals and specialists. The goal of making the document more publicly accessible likely can be achieved with the "Action Sheets" of this update and thoughtful progress reporting that puts terminology and progress in relatable terms and simple language. This would both enhance public accessibility while not undermining the specific technical direction that makes the IWRS such a valuable resource.</p>	Baseline goals for the update, developed in collaboration with the Water Resources Commission, were to better address equity, climate change, and incorporate input from the 100-year water vision. These were discussed at Commission meetings as early as November 2022. A key component of addressing equity includes developing inclusive communications. An interagency staff survey about the IWRS also revealed a desire for a more simplified document. The IWRS project team will continue to work toward this goal while continuing to be mindful about keeping important content from the 2017 IWRS.

	100-Year Water Vision	The proposed draft also states that “The 2024 Strategy borrows from the 100-Year Water Vision...” The Water Vision was an Oregon Watershed Enhancement Board (OWEB) led effort, and it points readers to “a state-supported Regional water planning and management work group” on the OWRD website, as well as the Tribal-State Agency Task Force, which was intended “to engage tribes in the implementation of the Water Vision.” How the IWRS, Water Vision, and Tribal-State Agency Task Force products interact and integrate is not clear even if the reader visits all three—or especially if a reader visits all three. Careful consideration does need to be given as to how these important documents work together, but simply having one subsume another seems to get us further from achieving this goal, not closer. We feel that both the Water Vision and the IWRS are too important to be merged in this way and are much stronger continuing to stand on their own.	The 100-Year Water Vision was led by OWEB in partnership with OWRD, but OWRD has been given responsibility to manage information moving forward. Website transitions between OWEB & OWRD are in process. The 100-Year Water Vision effort raised confusion amongst participants about how it related to the IWRS and participants requested that the public input be considered for the next IWRS. The 100-Year Water Vision successfully incited statewide strategic investment in water. However, the Vision did not receive funding to carry forward Phase 2. Only the IWRS is identified in statute and assigned resources. OWRD will not be carrying forward two separate processes, just the IWRS.
	Document Structure, detail	We acknowledge that water management challenges are, by their nature, complex; as such, efforts to address our water challenges must face this complexity. The IWRS is critical to developing and implementing integrated agency efforts in a coherent, statewide manner. Oregon’s agencies need this guidance—and this need is perhaps even more acute now than ever, given the high degree of leadership turnover in many of our key water resource management agencies, including OWRD, ODFW, and OWEB, to name a few. Going forward, we must ensure that the IWRS retains the structure and technical detail necessary to help this new leadership succeed in grappling with these complex challenges, not eliminate this detail.	Agencies play a critical role in implementing the IWRS, however most have not been using the document for strategic guidance. The 2024 draft provides additional technical detail beyond what was provided in the 2017 IWRS in the form of the action sheets which were developed by current state agency staff across ~15 agencies. While the 2017 IWRS only provided example actions, the 2024 draft adds detail about what agencies and partners should be engaged, the existing workgroups and programs that support the action, and lists additional resources such as related state plans/strategies, and funding opportunities.
	Document Structure	We thank OWRD for all of the work that has gone into this proposed revision. The agency’s efforts on this revision are an essential part of evaluating where we are, where we’ve been, and how we can improve going forward. However, in this instance, we feel that the best path forward is a return to the prior IWRS format that includes the following:	Thank you for your comment. The document reflects a significant interagency effort, including staff from five different agencies on the IWRS Project Team and all Water Core Team agencies (~15) provided detailed review and input on the narrative and action summary sheets.
		1.The addition of an introductory section that explains that water is a public resource; 2. The inclusion of a brief rationale for the IWRS itself; this would emphasize that the responsible use of public funds to develop, manage, and protect Oregon’s water for public benefit requires a scientifically rigorous, integrated water management strategy; 3. Continued refinement of the “Actions Sheets”; and 4. A commitment to IWRS progress reporting with plain language for public information and accountability.	Comments have been added to consider changes/additions to the "Introduction." Action sheets will continue to be refined. Agencies are working to design a process for work plan development and progress reporting.
		We believe that this should address the goal of making the document – and Oregon’s progress – more accessible to the public while holding firm and clear the original tenets of the IWRS.	Thank you for your comment.
2	Bridget Moran, U.S. Fish and Wildlife Service	The U.S. Fish and Wildlife Service (USFWS) appreciates the opportunity to provide comment on the Oregon Water Resources Department (OWRD) document, Oregon’s Integrated Water Resources Strategy, 2024 (IWRS). Per the IWRS website, the USFWS understands the goal of this document is to, “provide a statewide inter-agency framework for better understanding and meeting Oregon’s instream and out-of-stream water needs.” Our comments below are intended to support meeting this important objective.	
	Water Challenges	We were pleased to find mutual understanding in the following introductory statement under the section entitled ‘Current Water Challenges: We are not currently meeting Oregon’s water needs...’ (p. 9): “Oregon’s ecosystems and human communities are both experiencing water quantity and quality challenges. There is too much demand for too little water. Some water bodies have inadequate flows and/or water quality to support fish and other wildlife.” The USFWS shares this perspective and was eager to see how the IWRS would delve into such a challenging topic, tell a compelling story, and provide a roadmap to resolve this difficult issue.	Thank you for your comment.
	Story-telling, balance for instream	However, we struggled to find all these things fully and successfully effected in the sections that followed. We felt the IWRS missed an opportunity to tell a compelling story about Oregon’s water challenges, which in turn would convey a compelling strategy. Instead, we found the challenges presented more as a stiff series of fact sheets. We appreciate the difficulty in drafting large strategy documents, especially given the complexity of the issue and the breadth of the audience. Having developed many such documents ourselves, we share this feedback with respect. Broadly, our struggles likely largely reflect the departure of the structure of the IWRS from previous versions. Specifically, we found potential for improvement in the ways in which instream water needs were prioritized/balanced, instream water rights were described, climate change was addressed, and pre-listing conservation was discussed.	Thank you for your comment.
	Stronger focus on species & habitats, aquatic wildlife	Our primary concern pertains to how the IWRS framework seemed to balance addressing instream needs and out-of-water needs. Given our agency mission’s focus on species and habitats, we recommend a stronger focus on ecological instream needs. This stronger focus should include broader consideration of aquatic wildlife rather than exclusively fish.	The 2024 Draft 1 IWRS moved the "Healthy Ecosystems" narrative and actions to the beginning of Chapter 4/Objective 4 actions to emphasize the foundational role of ecosystems in meeting instream and out-of-stream needs (compared with where they were located in Chapter 4 of the 2017 IWRS). 2024 IWRS Actions 10A-10E contained within the Healthy Ecosystems discuss species needs beyond only fish. Additionally, the IWRS points to the need for implementation of Oregon’s Conservation Strategy.
	Instream water rights	Another important area where we saw opportunity for improvement was in the section describing instream water rights. The current draft may leave readers with the idea that establishing instream water rights is a straightforward process and that, once completed, water is provided. Through our work statewide, and particularly in the Deschutes Basin, we are acutely aware that exercising a water right is entirely dependent on its date of issuance and therefore seniority. As we understand and have experienced, because instream values were not initially recognized under Oregon’s Water Code, sufficiently fulfilling instream needs to protect ecosystem function is an ongoing challenge. Ultimately, we thought the strategy implied instream water rights protect instream flow, which they do not do in most instances due to their junior status. We recommend this section be updated to provide greater context and clarity.	The first time instream water rights are introduced (Part 1) is to explain the legal framework. Action 10C is the best place to enumerate the challenges/shortcomings with ISWR. The IWRS team acknowledges there are challenges with instream water rights translating to water instream, but also need to communicate that it is an action the agencies will continue to take. A comment has been added for the IWRS team to expand upon the narrative here.
	Climate change as standalone section	Additionally, we noted that the IWRS took a different approach to addressing climate change in the 2024 strategy from previous iterations. The USFWS agrees that incorporating climate change effects into all portions of analyses is a valid approach given its pervasive impact. The disadvantage to spreading this information throughout the document, however, is that the subject can potentially become deemphasized. Omission of a dedicated section specific to climate change unfortunately misses an opportunity to remind readers how critical this factor is to water management. We recommend reinserting a section about climate change, in addition to its current inclusion in the various sections throughout the document, to continue to help educate the public.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). The standalone Climate Change actions were re-distributed across all of the other actions (better integrating them). The IWRS project team will reinstate a standalone climate section with a short narrative, but retain the approach of having distributed climate actions.
	Highlight pre-listing conservation, edit to Action 8A	Lastly, the IWRS could do more to highlight and promote the need for pre-listing conservation of fish, wildlife, and plant resources and the habitats upon which they depend in Oregon. This feedback is likely most applicable to sections discussing instream flow needs and groundwater dependent ecosystems (Instream & Ecosystem Water Needs, p. 115). By “pre-listing conservation,” we are referring to water conservation to support the needs of a wide array of native species that are not Federally protected under the Endangered Species Act (ESA) but are recognized as in decline, at-risk, sensitive, or of concern. The IWRS is an important framework to reduce or avoid the need to add additional species to the ESA. For example, an action in 8A of the IWRS is listed as, "Prioritize basins and install monitoring equipment to help characterize the full suite of flows through these basins." In previous iterations of the IWRS, this was stated as, "Identify basins with listed species and install...". Perhaps a better edit would be "Prioritize basins, considering at-risk species and data gaps, and install monitoring equipment..."	The first critical issue in Chapter 4, "Healthy Ecosystems" calls for protection and restoration of a variety of habitats and the species that rely on them, not limited to listed species. Chapter 4 focuses on management and stewardship actions, while Chapter 3 focuses on data needs. The IWRS strives to support the actions in the state's Plan for Salmon & Watershed and Oregon's Conservation Strategy. Suggested edits to Action 8A example action have been made.
		Specific Comments:	
	p 25	P. 25. Second paragraph under the Endangered Species Act header: Suggest adding: While there are some exceptions, generally speaking, the U.S. Fish and Wildlife Service.....	Suggested edit was made.

p 25	P. 25. Suggested additions highlighted in yellow: The state of Oregon and the federal government maintain separate lists of Threatened and Endangered species. Under state law (ORS 496.171-496.192) the Fish and Wildlife Commission through the Oregon Department Fish and Wildlife maintains the list of native fish and wildlife species in Oregon that have been determined to be either “threatened” or “endangered” according to criteria set forth by rule (OAR 635-100-0105).The Department leads the development of conservation and recovery plans for state ESA-listed fish and wildlife species. Coordinated action with citizens, and other local, state and federal agencies is essential for successful implementation.	Suggested edits were made.
p 29	P. 29 Forest Practices Act: The Senate and House bills referenced in the last paragraph of this section also included development of a new mitigation program to be managed by ODFW and funded with both state general fund and timber industry funds (PFA Mitigation Program). Given the significant dollars that will be invested in habitat restoration and species conservation (\$10 million + annually) a paragraph summarizing the mitigation program in this section may be warranted.	A comment has been added to the draft. The IWRS project team will discuss and develop narrative for the PFA Mitigation Program. A better place to describe the program may be Action 10A.
p 29	P 29 Fish Screening and Passage Laws – Suggest adding that guidance exists to provide fish passage to ESA listed salmonids (West Coast Fish Passage Guidelines NOAA Fisheries) for waterways where they are present, as well as other native fish such as Pacific Lamprey that have unique swimming and passage needs (Lamprey Technical Workgroup Pacific Lamprey Conservation Initiative).	The more appropriate place for guidance materials is in the narrative and action summary sheet for Action 10B "Protect and Restore Fish Habitat and Fish Passage/Screening". Links to guidance documents have been added.
p 31	P. 31. 2015 The Oregon Chub and Modoc Sucker are the first and only de-listings of fish species under the Endangered Species Act Suggest this statement be revised to say: 2015 the Oregon Chub (Willamette Valley) and Modoc Sucker (SE Oregon) become the first and second fish species respectively in the nation to be delisted due to recovery under the Federal ESA. Two additional fish species in Oregon have been delisted since that time (Foskett Spring speckled dace and Borax Lake chub).	Edits were added to address geography. There is currently a separate line item for the dace and chub delistings in 2020.
p 55	P. 55. Partner with Federal Agencies, Tribes, and Neighboring States in Long-Term Water Resources Management. The USGS' Integrated Water Science study (linked below) in the Willamette Basin should be summarized and referenced, probably in numerous sections of the IWRS document. https://www.usgs.gov/news/national-news-release/usgs-selects-willamette-river-basin-fourth-integrated-water-science	A comment has been added to describe the Integrated Science Study in Chapter 3, Data & Analysis under Action 7A "Improve Water Resource Data Collection & Monitoring"
p 66	P 63. in Chapter 2 on Partnerships and Planning “Deschutes Basin Habitat Conservation Plan (HCP) – The Deschutes Basin is an area where irrigation interests and fish and wildlife needs had long been in conflict. Over 10 years ago, tribes, agencies, irrigation districts, and the public came together to forge a new approach to water management in the basin. The partners, led by the local irrigation districts, developed an HCP, which is a long-term plan that includes specific conservation measures to minimize and mitigate the effects to the covered species caused by the activity (managing water in this case). The Deschutes HCP was finalized and approved by the U.S. Fish and Wildlife Service and the National Marine Fisheries Service in 2020, and 2023, respectively. The HCP offers many practices to better align the water management operations with the life-history needs of covered species. The aquatic species covered by the U.S. Fish and Wildlife Service in this HCP include the Oregon spotted frog and bull trout. The National Marine Fisheries Service permit covers steelhead and sockeye salmon - all federally listed as threatened species. The HCP has resulted in increased coordination across many interests which has helped the area navigate irrigation and wildlife challenges during consecutive years of drought.”	Suggested edits were made.
	P 65. in Chapter 2 on Partnerships and Planning, Action 3A “Partner with Tribes, Federal Agencies, and Neighboring States in Long-Term Water Resources Management” suggested changes in yellow highlight.	Suggested changes from USFWS are shown in red (rather than yellow highlight).
	Conduct collaborative planning to develop water management approaches to protect species and avoid or minimize impacts to endangered or threatened species .	Edits were made to the example action under Action 3A
	Documents Deschutes Basin Habitat Conservation Plan Add link to story map? Flowing to the Future (arcgis.com) Federal Endangered Species Act species recovery plans (USFWS & NOAA)	Links have been added to all
p 96	P 96 in Chapter 2 on Natural Hazard Mitigation Planning, Action 6B Examples could focus on “nature-based solutions” to minimize flood impacts via restoration and ecological approaches. Potential addition to current bullet shown below, various examples available if desired through restoration actions statewide. Suggested changes in yellow highlight.	While federal programs have started using "nature-based solutions" the term includes "natural" and "green" infrastructure. Another term increasing in use is "natural climate solutions," which focuses more on climate mitigation. The IWRS team will consider how best to introduce and use these terms throughout.
	Invest in built and natural infrastructure, including nature-based solutions , refer to Actions 5B, 10A-10E, 12C, and 13A”	Edited to "natural infrastructure (i.e., nature-based solutions)"
p 103	P. 103. Consider adding non ESA listed species to broaden conversation around pre-listing, species of significance, etc. Suggested changes in yellow highlight. “In addition to these indicator species, the U.S. Fish and Wildlife Service, which has authority for monitoring nonanadromous fish species that reside year-round in Oregon’s rivers and streams, has listed five species as either threatened or endangered (Bull trout, Lahontan cutthroat trout, Hutton tui chub, and Shortnose and Lost River suckers). Several other aquatic species are proposed for listing or being assessed for potential listing, including the Northwest pond turtle and the Western ridged mussel. The high number of aquatic species listed as threatened or endangered are worsened by declining water quality and quantity in many areas of the state during critical life history periods and can be an indicator of inadequate ecosystem health. Recovery efforts by local, state, tribal, and federal entities are underway for these listed species, as well as other species of significance such as Pacific Lamprey , which include improving habitat connectivity, increasing habitat quantity, and improving habitat quality.”	Suggested edits were made.
	Chapter 3 on Data & Analysis No specific USFWS comments in this chapter. Improved data on water use and needs is clearly important and will aid in planning for and prioritizing holistic ecosystem approaches to water management.	Thank you for your comment.
	Chapter 4 on Stewardship	
p 135	P 135 in Chapter 3 on Stewardship in Ecological Services. Link in reference to Klamath NWR does not work. Update: https://www.fws.gov/refuge/lower-klamath	Link has been fixed
	Fix the link in the wetlands paragraph (not working) and consider updating the text based on the most recent report, Status and Trends 2009 to 2019. 2019 Wetlands Status and Trends Report U.S. Fish & Wildlife Service (fws.gov)	Link has been fixed. The report covers national trends and does not provide any specific data for Oregon. Will consider including the national perspective/findings.
p 138	P 138 – 139 Section on Fish Passage and Fish Screening Recommend adding a mention of Pacific Lamprey (an anadromous fish of tribal significance) as this species has specific passage and screening needs that are often inexpensive to integrate into passage or screening projects, native fish such as Pacific Lamprey, Sculpin, sturgeon, etc. are not as strong of swimmers as salmonids and generally get less attention in fish passage/screening conversations as they are not ESA-listed.	Narrative has been added to mention lamprey, sculpin, and sturgeon. A link has been added to lamprey passage guidance documents, also added to resources on Action 10B
p 141	P 141 Section on Instream Transfers and Leases Recommend adding mention of OWEB’s water acquisition grant program which can fund these transfers and leases to improve water instream. Current budget is around 9M and only about 500k applied for funding in 2023/4 cycle, showing there is opportunity for more transfers or leases where ecologically beneficial.	Narrative has been added describing OWEB program.
p 145	P 145 Agency Programs Include USFWS Partners for Fish and Wildlife Program and National Fish Passage Program, two funding programs that support watershed restoration efforts. https://www.fws.gov/program/partners-fish-and-wildlife https://www.fws.gov/program/national-fish-passage	Programs have been added to action summary sheets for Actions 10A and 10B.

3 Chris Hall, Water League		Aside from this opening introduction, generally speaking, OWRD & WRC can assume if any section or provision of the IWRS is left unaddressed, it is because Water League agrees with or supports that part and no further discussion is needed. It is the nature of such critique, that if we were to comment on everything good in the document, our comments would be much longer than the IWRS itself.	Thank you for your comment.
		Water League strongly supports the draft 2024 update to the IWRS. While we have numerous critiques throughout, none detract from our view that this IWRS update is anything less than visionary for our times and a model for all other states in the West to follow. Do not think for a second that the force of our critiques below belie our substantial support for this great work.	Thank you for your comment.
	Supports Restructure, Responds to Secretary of State Water Advisory Report	Key to understanding the 2024 IWRS update is the organizational logic, which is that there are three ways to look at how water flows through Oregon (place) and the lives of all entities (humans, flora, fauna). Prioritizing one perspective over the other necessarily causes a misrepresentation of the entire picture. Therefore, the 2024 IWRS update is a holistic integration that holds all three views together simultaneously to form the gestalt that has been missing in previous versions of the IWRS. This arrangement is excellent. The IWRS labels the three perspectives as: 1) Goals, 2) Objectives, and 3) Chapters. In the 2012 and 2017 versions of the IWRS, only the Objectives were heading priorities, and everything else came under those four objectives. In the 2024 update, the IWRS holds the contents of the goals, objectives, and chapters together on a more interactive level. While there are two Goals that oversee the entire strategy (understanding needs and meeting needs), the four Chapters articulate the entire structure of the strategy: Chapter 1 is about the funding, which is required for everything and anything to get done; Chapter 2 is about the people and planning, which again, is required for everything and anything to get done; Chapter 3 is about analysis of all aspects water touches, which is required to strategize, puts the the "S" in IWRS, and Chapter 4 is about solutions, which are required if anything is to get done – the purpose for the IWRS in the first place. But then, the Objectives inextricably tie the goals and chapters together, and by doing so, appear in their own way to be major headings around which the Goals and Chapters orbit. This constellation is nothing less than a work of genius, where Goals, Objectives, and Chapters orbit each other in a heterarchical fashion, leading to a strategy that is elegantly simple in its ability to organize complexity that the public can understand and state agency professionals can use to work together effectively. If there was an answer to the Oregon Secretary of State's Water Security Advisory Report, it is the 2024 IWRS update.	Thank you for your comment.
	Urges WRC Support	Overall, and notwithstanding our numerous critiques below, Water League strongly supports this draft version of the 2024 IWRS update, and urges the WRC to support OWRD staff in their current progress.	Thank you for your comment.
	Address "in-ground" and "out-of-ground" as well as instream and out-of-stream	One central and over-arching correction to the IWRS is that it must use language to incorporate inground and out-of-ground needs simultaneously with in-stream and out-of-stream needs. There is no sense in ignoring groundwater in the 2024 update to the IWRS. See 8C on Groundwater Dependent Ecosystems on page 118. Also see page 142 under Action 10E is the argument in favor of this inclusion: The Oregon Atlas of Groundwater Dependent Ecosystems, published in 2022, found that more than a third of all streams and rivers depend on groundwater, and about two-thirds of all lakes and ponds do as well. Groundwater discharge contributes to springs, wetlands, and streamflow throughout the state, often providing sustained flows and vital cold water for aquatic species during summer months. Contributions from groundwater support ecosystems (known as groundwater-dependent ecosystems) and human systems alike. Land and water are one entity, how we separate land and water must be done more carefully; to view surface water as the only needs-based phenomenon and to exclude groundwater from the same is nonsensical and the double-standard must not be allowed to persist any longer.	ORS 537.332 defines "instream" as "the natural stream channel or lake bed or place where water naturally flows or occurs," which would include groundwater. The 2024 IWRS includes groundwater in the "instream use" definition (p 3).
	Part 1: Oregon's Water Context, Increase acknowledgment of responsible parties	There are general anthropogenic (indirect) effects such as climate change and there are specific (direct) human effects such as over-appropriation of water sources by policy-makers and over-pumping of streams and aquifers by irrigators. Both indirect and direct forces lead to water scarcity. The IWRS should acknowledge both of these forces; however, the IWRS is long on climate change, moderately vocal on policymakers culpability, and virtually silent on large-scale irrigators who use 78% of all diverted water in Oregon. It's not until page 144 that there is a scant reference to the direct damage caused by over-pumping. Because no one is solely responsible for climate change, it's easy and politically safe to blame our entire social structure for our water source problems resulting from climate change, but our specific human impacts withdrawing too much water for large-scale irrigation are also a major part of the equation that can no longer be ignored. The more the state chooses the 20th century political calculation to ignore certain and very specific non-beneficial uses of large-scale irrigation water uses that harm the public health, safety, and welfare, and foreclose upon the water future for posterity, the more the public will organize among itself for redress. Water League urges the OWRD and WRC to serve the greater public interest over the special interests of the very few who use too much of the water that belongs to the public. The IWRS highlights the problems innocent people experience regarding their access to water, which is important; however, the draft does not sufficiently hold the parties most directly responsible for causing the problem accountable. The decision to omit responsible parties (policy-makers and irrigators) is a political act and the silence on the matter is loud and clear. If it were not for the fact irrigators use four out of five gallons of all water diversions, and state policy-makers let them, we would not single them out.	Thank you for your comment.
	Irrigation and public interest	Too many of the large-scale irrigation needs are highly destructive and pose direct risks to water supplies and others' needs. What happens when a need becomes a problem or challenge? The IWRS must acknowledge that some out-of-stream needs are actually significant problems. We know this to be the case in regions where irrigation depletes aquifers and the state must designate Critical Groundwater areas. Irrigation may be a need for the particular user, but in some cases it morphs into a problem for the general public. The IWRS cannot ignore this phenomenon because all water use authorized by water rights must be simultaneously in the water user's interest and the greater public interest in the present and the future. To be clear, when a need becomes a problem, it may still be a need to the individual user but is a problem to society. For far too long, irrigators have been lambasting the ecosystem for "using" too much water and for taking water from irrigators. They invented the idea that the ecosystem, which is the source of all water, takes too much water from irrigators, even though irrigators are the most significant water diverters. This Orwellian chicanery is a racket devised by cunning water use attorneys and lobbyists in the 20th century.	Thank you for your comment.
	Irrigation not meeting public interest	The law requires water use must be in the public interest first and foremost before any one individual can seek to aggrandize themselves with that water which belongs to the public. We note that it is the explicit policy of the state that water use must be for economic purposes. Presumably, this is one of the most important aspects of the public interest. ORS 536.220 Policy on water resources generally; integrated state water resources strategy, states [emphasis added]:(1) The Legislative Assembly recognizes and declares that: (a) The maintenance of the present level of the economic and general welfare of the people of this state and the future growth and development of this state for the increased economic and general welfare of the people thereof are in large part dependent upon a proper utilization and control of the water resources of this state, and such use and control is therefore a matter of greatest concern and highest priority. Irrigation falls far short of this legal standard that water use must be in the greater public interest. While the business case for large-scale irrigation is nearly impossible to make (see comments below for Chapter 3), and its relative economic value to the state is grossly overstated by the public relations of its special interest class of proponents, the law requires that the future growth and development of the state is paramount. While much of the language in the IWRS reflects this perspective, none of the aspirations will amount to anything without concrete actions to identify the problems that once were viewed as needs.	Thank you for your comment.

Address impacts by human uses	Climate change is a serious existential threat, but so are drained aquifers and dewatered streams resulting from over-pumping. Without recognition of the impacts caused by such direct human uses, the problem of water scarcity will not be stopped; rather, negatively impacted people will be forced to adapt, and at best, they will only ever receive limited assistance. Inequity is in letting the problems persist on the pretense that those who have been causing the problems have more influential lobbyists than those who are told to adapt to the resulting negative impacts. This is an insidious and pernicious form of victim-blaming. In too many locations, large-scale irrigation harms rural front-line communities by drying up their domestic wells and threatening municipalities. Long-term municipal water plans looking 75 years out don't know where their water will come from, in part, because they are told animal forage crops and other export crops irrigated with senior water rights are more important than the junior municipal water rights. Today, lobbyists "equity-wash" large-scale irrigators by arguing during the Groundwater Allocation rule-making process that it's only fair that if irrigators cannot get new water rights, then neither should cities get new water rights, no matter the fact that irrigators use eight times as much water as all cities combined and much of it results in Virtual Water Exports.	Thank you for your comment.
Declining GW and growth v irrigation	The IWRS update cannot repeat this false assertion: "Declining groundwater levels and low streamflows are also raising concerns about the ability for the state to take on additional development and growth." pg. 10 There is a false equivalency that water use must be limited for future residential and municipal development because those uses are such a tiny fraction compared to large-scale irrigation. The governor's call for additional housing should not be confounded by large-scale irrigation over-pumping that is eight times more water than all municipal use combined. An increase in population does not increase domestic/ municipal water use by a level that could ever compare to the volume of water already used by irrigators. Why? According to the Oregon Department of Agriculture, Oregon exports 40% of agriculture products to other states and 40% to foreign nations for a total of 80% of all agricultural products leave the state. Oregon's population and irrigation water use have not been coupled together over the past 75+ years. Whether there are two million, four million, or six million residents, the vast amount of water used by irrigation wouldn't increase commensurate with population growth. Indeed, during the 20th century, irrigation water use increased many times faster than Oregon's population growth; then irrigation use plateaued in the second half of the 20th century. Since population growth does not correlate to more agricultural exports or large-scale irrigation water use, and since only 1.5% of the population are farmers, and since irrigation uses 78% of all water diverted from streams and aquifers, increases in water use associated with population growth are negligible. 5% of Oregon agricultural operations account for 80% of the \$5 billion industry. The other 95% of farmers account for only 20%, or \$1 billion. When making state policy on water use, the IWRS must consider these statistical facts: a very small number of very large agricultural operations not only imperil Oregon's water sources for a 1.5% return on GDP (See the Business Case below in Chapter 3), but they also threaten that vast majority of small farms, which are the leading sector that distributes farm product locally and within the state for a relatively small amount of water use. Large-scale irrigation uses so much water to benefit others outside the state -- Virtual Water Exports --that no amount of expected in-state population growth will ever negatively impact Oregon's water sources the way export crops do.	The text has been changed to "raising concerns among the public about the ability for the state to take on additional development and growth." The widespread occurrence of dry domestic wells across the state, along with reduced water allocations associated with drought have all raised awareness among the public that water supplies are not meeting current demand. How we choose to meet those needs in the future is the primary focus of our collective work across all sectors.
	On page 9 typo "Federally recognized tribes are recognized as sovereign with control their of their governance, land, and resources."	Correction has been made.
EJ and Over-pumping	On page 11 the IWRS says "Environmental justice is closely linked to equity regarding the fairness of those experiencing negative environmental or health outcomes." And what is the main source of unfairness? It is a tiny few who are authorized the right to over-pump our streams and aquifers and threaten the public and environmental health, not just for the present, but also for the future.	Thank you for your comment.
Overpumping & over-appropriation	And a quote from the 100-year Water Vision strongly suggests Oregonians must stop the overpumping of streams and aquifers and remediate the over-appropriation of water sources. Not addressing these two problems makes all others seem moot.	Thank you for your comment.
	On page 26 is an extra space typo "The adjudication process is time-consuming , requires..."	Correction has been made.
Administrative basins	On page 27 IWRS says there are "20 administrative river basins." Aren't there 19 basin in Oregon? Also, it says here "The regulations categorize surface and groundwater based on permitted uses..." Is "categorize" supposed to be "classify"?	"Classify" is the correct term, the change has been made. There are 20 administrative basins, listed on our website here: https://www.oregon.gov/owrd/programs/administrativebasins/Pages/default.aspx
Guiding Principles	On page 36, Heading, "Guiding Principles:"	
	The sub-heading "Balance" states: "Actions should consider and balance tradeoffs between ecosystem benefits and traditional management of water supplies." The IWRS should correct for the egregious decades-long imbalance between 1) the over-appropriation of water rights resulting in the over-pumping of our streams and aquifers by large-scale irrigators and 2) the natural environment from where all water originates and communities which suffer in myriad ways by the destruction of Oregon's water sources. The act of calling for "Balance" makes for a good aspiration to point to as political cover for when the state chooses, in fact, not to balance water uses. The IWRS must have concrete, measurable actions that repair the imbalance of the past, and balance water use in the present for the benefit of the future.	Guiding Principles were developed by the 2016 PAG and no changes are currently proposed.
	Under the sub-heading Conflict Resolution, the IWRS should suggest that the OWRD will develop a process for conflict and dispute resolution, preferably in coordination with the programs at UO and OSU.	Thank you for your comment. The Guiding Principles are not the right location to identify such a specific solution. Partnerships to support dispute resolution will likely evolve over time.
	The sub-heading Facilitation by the State, which says "the State should provide direction and maintain authority for local planning and implementation," OWRD should consider the concept of mirroring the land use system DLCDC has, and create one for water use: WRC should work with the LCDC, EQC, governor, and legislators to form political sub-divisions along Oregon's 19 basin boundaries to establish statewide planning goals for water use and quality with which local Basin Districts can coordinate.	Thank you for your comment. Updates to Administrative Basin Program Rules are another route to address water use and quality goals.
	The sub-heading Implementation is similar to Facilitation by the State, and perhaps the two could be combined or reference each other.	The draft will keep them separate, as the intention behind the "Facilitation" guiding principle focuses on planning, with the "Implementation" addresses the full suite of IWRS actions.
	The sub-heading Interconnection/Integration says that "that many actions (e.g., land-use actions) in some way affect water resources (quality and/or quantity)" is similar to Facilitation by the State, and could be combined or more closely connected (also with Implementation).	The draft will keep them separate as "Interconnection/Integration" makes a distinction about impacts to water quantity and quality.
	The sub-heading Sustainability, which says "Ensure that actions sustain water resources by balancing the needs of Oregon's environment, economy, and communities," is similar to Balance, and perhaps the two can be combined or more closely connected.	Thank you for your comment.
Ch 1 Funding	The IWRS says that "Climate change is increasing pressure on our ecosystems and water supplies and heightening awareness about the weaknesses in our water management systems." Yes, quite true; however, for the past 70+ years, large-scale irrigation has been putting immense pressure on our ecosystems and water supplies. The IWRS should also acknowledge the substantial negative impacts large-scale irrigation has had and continues to have is a great injury to the public health, safety, and welfare and a betrayal of Oregon officials' fiduciary duty to hold water in trust for the public.	Thank you for your comment.
	2023 Drought Resilience and Water Security Package on pages 40-41 – List in order of largest appropriation to smallest.	Suggested edit has been made, the list has been re-ordered.

	Remaining Funding Gaps on page 41, there is an awkward sentence: "Financial incentives continue to be needed to encourage the agricultural sector to or senior water rights holders to dedicate water instream." The sentence could be re-written as "Senior water rights holders in the agricultural sector need financial incentives to dedicate water instream."	Recommended re-write has been made.
Policy change for canceled water rights	Perhaps the state policy should pay annual amounts until a fixed amount per acre has been reached and at that point, the water right or the portion that was dedicated in-stream is canceled. This would be akin to the water right holder transferring their water right into oblivion for a fee. In basins where streams are over-appropriated, no new water rights should ever be permitted upon the cancelling of a right. This is the only way to return to a non-over-appropriated basin. This system should be articulated in the IWRS, which could recommend statutory language, if needed.	Thank you for your comment. The IWRS offers many tools for over-appropriated basins, see Actions 10C, 10E, 12B, and 12E.
Action 1B, fund monitoring irrigation water rights	Action 1B, Fund Water Resources Management at State Agencies says "For day-to-day operations at state agencies, there are many examples of Strategy implementation activities that require funding," but nowhere is there any call to fund monitoring irrigation water rights to audit their use to ensure water is not wasted on non-beneficial uses. Such an activity is central to (core) water resources management; indeed, it may be the most important facet of water resource management in which the state could and should engage. If OWRD staff believe statutory language is required to enshrine such a water resource management system into law, then this IWRS update could suggest such language. If OWRD staff can call for increased budget appropriations in the IWRS, which are inherently calls for legislation, then they certainly can call for funding new legislative concepts.	See Action 9A for the call for measurement and monitoring, Action 12F to increase field staff, and Action 12G to strengthen water permitting. While the bullet list on page 42 attempts to remain multi-agency in nature, a draft bullet has been added reflecting OWRD's unique role, "Measuring and distributing water and regulating and enforcing water rights."
Fund GW research	Also, there should be a clear and direct call for groundwater research funding for water availability information, such as: water levels in aquifers, studies of groundwater flows, (including transmissivity and storage coefficients), knowledge about excessively declining water levels, what are reasonable permissible total withdrawals, etc. More about this is discussed later on in the IWRS, but a direct call for specific funds in this section would be helpful.	Action 1B narrative includes bullet #3 on page 42 calling for agency funding for "Improving scientific information, including data collection, analysis, sharing, and use in decision-making." Actions 7A-7D provide more detail about data needs for water levels, groundwater basin studies, etc.
Sources of agency funds	Sources of Agency Funds fix the awkward sentence that says on page 43 "The Legislatively approved budget for 2023-25 shows..." and change it to "The legislature-approved budget for 2023-25 shows..." Just below is this awkward sentence: "Federal funding sources can help support targeted agency projects, and most recently, provided a much-needed boost to help replace and upgrade water infrastructure." Perhaps rewrite "Federal funding sources can help support targeted agency projects; most recently, they provided a much-needed boost to help replace and upgrade water infrastructure."	The state's budget website uses the term "legislatively approved". The suggested edit to the sentence has been made.
Action Summaries	On all Action Summary Pages, include OARs that are pertinent authorities along with the ORSs.	Thank you for your comment. This would be a valuable resource but would require a significant time investment. The IWRS project team will consider the feasibility of this task.
	On the Action Summary Page for 1B, the authority referred to is the Governor's Budget – how did this compare to the legislature-approved budget the governor signed?	The link for the Governor's budget was the only thing available during fall draft development. The link has been replaced with the LAB.
Ch 2 Partnerships & Planning	Page 49 IWRS says "Multi-year droughts, floods, and extreme temperatures will continue to affect both water resources and water needs now, and into the future." Comment: Too many of the large-scale irrigation needs are highly destructive and pose direct risks to water supplies and others' needs. What happens when a need, such as irrigation, is an issue -- a problem-- a challenge? The IWRS should consider the question of what to do about the intersection of needs and problems. We don't typically see the two as two sides of a coin and such an investigation into the idea has merit.	New prioritization efforts around the IWRS may offer some tools for this question.
Pressures, irrigation v population	On page 50 Education & Outreach – IWRS says "Pressures on our water resources, including population shifts and climate change..." Comment: First, population does not put much pressure on water resources compared to irrigation – not by a long shot; second, irrigation use should not be ignored alongside climate change. As much as some want to call irrigation a need, it is really more of a problem. This sentence should say "Pressures on our water resources by irrigation and climate change..."	The narrative has been revised to replace population shifts with irrigation. An edit has been made to list climate change first, irrigation second.
Pressures, irrigation v population	On page 56 Provide Career Training for the Next Generation of Water Professionals is the same problem. IWRS says "Challenges posed by climate change, aging infrastructure, and population increases have increased the demand for water professionals." Comment: Population increases are not nearly as impactful as the ongoing over-pumping by irrigation, which is eight times as large as all municipal uses and domestic uses combined. Note the comments above that discuss how population growth is negligible regarding increased water use.	A focus for this action is the deficit in utility sector workforce - for drinking water and wastewater infrastructure. This sector is sensitive to population shifts and has less to do with irrigation happening elsewhere.
State and Tribal processes	On page 62 State and Tribal Partnerships IWRS says "When requested by a tribe, agency directors engage in formal consultation with tribal leaders. These consultations often revolve around cultural and natural resource issues, water needs and water rights, water quality monitoring, or watershed management, protection, and restoration." Comment: UNDRIP is not just consultation; it is also free, informed, and prior consent preceding and following consultation. There should be extensive language discussing the process. Please include a footnote for "Energy Storage and Environmental Justice: A Critical Examination of a Proposed Pumped Hydropower Facility in Goldendale, Washington" (Cantor, et. al., 2023) as part of the IWRS citations. The paper is an excellent survey of the process and issues.	A comment has been added to the draft to consider expanding narrative here. Thank you for bringing forward the Cantor, et al paper. A footnote and citation has been added Chapter 4 on page 194 with narrative describing pumped storage systems.
Klamath dam removals	On page 64 in the discussion of the Klamath dam removals – Update with more recent information, discuss the unprecedented nature of the project, and its success so far, and use more direct language -- less passive tense.	This section will be updated based on the next draft publication date.
State Agency Coordination Program, updates to Community Engagement	On page 65 State Agency Coordination Program – Yes -- call for an update to the OWRD and other agency SACs more deliberately and discuss some of what the content could be, such as more robust guidelines and requirements on comprehensive plans coordinating with the OWRD SAC. Too many localities are out of sync with the OWRD SAC. Comprehensive plans must be required by law to be updated within a reasonable period (every 10 years) and should be in compliance with all statewide planning goals and all agency SACs. Also on page , IWRS says "Oregon Revised Statute 541.551 requires six state agencies to develop and adopt rules for best practices for community engagement." Comment: Now that a draft is out and been presented to the public, consider a longer description of the plans and proposed rule-making.	The rulemaking process may be complete before the next IWRS draft is released. A place-holder has been added to expand the narrative describing the community engagement rulemaking.
Action 3B	Under Action 3B IWRS says "agency actions are compatible with acknowledged city and county comprehensive plans and land use regulations." Comment: This logic is backward – it's not how SACs work. The localities must bring their comprehensive plans up to the standards of the statewide planning goals, and the various agency SACs, which many cities/ counties have not done. The state of Oregon preempts its political subdivisions, such as all the counties and cities, and the political subdivisions, for the most part, must write and update their comprehensive plans to coordinate with agency SACs and the statewide planning goals. While land use is a local power the state gives to its political subdivisions, the state has also retained substantial power to direct coordination of local land use plans with the state.	That statement is consistent with the DLC website and ORS 197.180, but has been flagged for additional clarification in the draft IWRS. The order of operations for SAC's is important for this description. ORS 197.180 (1)(b) states agencies shall carry out planning duties... "in a manner compatible with acknowledged comprehensive plans..." The SAC for OWRD (p 51) further describes "Coordination and Compatibility Procedures" that the Department will "Work with local government planning officials to amend comprehensive plans as needed..."
Water Planning	On page 69 Water Planning – some thoughts: Plan has been called a "four-letter word" because the concept implies change, and change means the current unsustainable and destructive status quo would evolve into a system that ensures the public health, safety, and welfare of the present and future. The power politics entrenched over the past 70 years by the largest water users are at risk by planning. Two typos here: "The process starts by building a collaborative and inclusive process with diverse water interests. Planning steps include characterizing water resources for the area and examining current and future instream and out-of-stream water needs Ultimately, a place-based plan..." Replace "with" with "among" and add a period after "needs."	Corrections to typos have been made.

Include future generations in "water interests"	<p>On page 69 IWRS says in the blue box "Includes a balanced representation of water interests."</p> <p>Comment: Water interests are not just those who use the water (that belongs to the public); people's interests reach far beyond to the greater public throughout the state and, most importantly, to the future public. Oregon's current water policies treat the present members of the public as Senior water right holders, and the future public as junior water right holders who are being foreclosed upon and regulated off. Oregon water policies should consider whose interests are represented and whose are alienated -- whose are disregarded by systemic and historic inequity, and what "water interests" means in our society more broadly. Not including future generations is wrong inasmuch as allowing those who mine groundwater and dewater streams is wrong.</p>	Thank you for your comment. As written there is no exclusion of future water interests receiving representation.
Use of terms "instream" and "out-of-stream"	<p>On page 70 is the reference to "out-of-stream interests."</p> <p>Comment: The use of these terms -- in-stream/ out-of-stream -- creates and perpetuates partisanship, even if that is not the intention of the people using these terms. This inherent partisanship works against the well intentioned efforts at community place-based planning. The so-called human public interests "in and out" of stream are much more than the facile description here, where municipal and domestic users are labeled as "out-of-stream interests." Relative to their minuscule volume of water use compared to irrigation use, many domestic water users care for much larger volumes of water to be conserved in aquifers and left in streams for the present and for the future.</p> <p>Their tiny domestic water use -- 3% of all diverted water -- is neither a threat to aquifers and streams, nor is it the way they should be labeled when they, as resident members of the public, may care a great deal for water left in the ground and in the stream. To say they eat their share of irrigation when they get hungry three times per day is a fallacy since only 20% of Oregon's agricultural products remain in the state. The segregation of members of the public into units and labels makes sense only when the overwhelming and substantial water use they engage in is both responsible for injury/ damage and is the vast majority of all water diverted for use. Irrigators use 78% of all out-of-stream and out-of-aquifer water, and they do so for commercial profit, which is a significant and unmistakable out-of-stream/ outof-aquifer interest. As a class, because they pump so much water out of the ecosystem, they can rightly be said to be out-of-stream interests. The same cannot be said to the same degree for all other interests because such terminology inequitably misrepresents who they are, what they do for a living, and what they care about. It's clear what irrigators care about: commercial out-of-stream water use on a massive scale. Decades of their lobbying and political pressure have made an indelible mark on the laws and ecosystem. Not so for other water users who have seen their water get exported out of the state in the form of products they never consume. Since irrigation water use dwarfs all other water uses combined by a factor of four, there is no sense in labeling other smaller water use types into the segregated partisanship of instream vs. out-of stream; inground vs. out-of-ground. Of the four million domestic and municipal water users, many may wish to not be forced into the out-of-stream partisan camp, especially since their water use is so insignificant and wish to see the water that belongs to them in the streams and in the ground.</p>	The instream versus out-of-stream terminology reflects the direction provided in Statute (536.220). A comment has been added to the Introduction to look for ways to illustrate the range of "out-of-stream" uses along with their respective % of use. Other states avoid this by looking at specific water "sectors."
Use of the term "stakeholder"	<p>On page 70 Independent Evaluation and Regional Water Planning and Management Workgroup IWRS says "to document stakeholders' perspectives regarding their experiences with the program..."</p> <p>Comment: There is a problem with the term "stakeholder" that can no longer be overlooked: the term necessarily excludes others who are not perceived, invited or allowed to be "stakeholders;" however, many members of the public would like to hold the stake -- especially those who are not here yet, people from the future whose lives are at stake. The exclusion of those who are not in the class as stakeholders is not acceptable and contrasts sharply with efforts to increase the diversity, equity, and inclusion of people in situations that impact their lives. Too often and for too long, there has been a cynical use of the term stakeholder by officials and others in positions of management to intentionally exclude others they don't want around or included. Who determines if someone is a stakeholder or not? How often is that determination unjust and inequitable? We urge you to work towards another perspective and set of ideals that can lead to actions which are more inclusive than the regressive notion of "stakeholder." Perhaps the the Regional Water Planning and Management Workgroup is a model for a solution. Many members of the public care about water use in regions outside of where they pay rent/ mortgage, and where they go to work. Many have family and friends in various regions, they visit those regions, or once may have lived there themselves. Some may wish to hunt, hike, camp, fish, or practice cultural traditions of their ancestors. Some may even have come to know about regions they have never visited before through means of literature, education, and outreach from residents of those regions who ask for help and support (a common form of connection). While Water League is from the Illinois Valley in Southwest Oregon, and all those who Get in League with Water are from all over the state and the West, what we all have in common is care and concern for regions near and far. There must be a resolution to the purpose of place-based planning that exalts community rights and preserves cultural heritage but also recognizes that many people have interests far and wide for many reasons.</p>	Action summary sheets made an effort to avoid the term "stakeholder" as, in addition to the problems you described, it also has negative connotations regarding the placement of stakes during colonization to demarcate and take indigenous lands. There is a much larger effort needed to revise the use of the term throughout agency practices, but note that the statute guiding the IWRS (536.220) still uses the term. A comment has been added to p 70 of the draft to consider the use of the term and perhaps expand upon the inequities of processes that exclude and proposals for change.
PBP	<p>On page 71 IWRS says "In order to succeed, place-based planning must be championed by local leaders, coordinated with state agencies, and supported by instream and out-of-stream interests across the state."</p> <p>Comment: This is excellent and should be elaborated upon.</p>	Thank you for your comment. The PBP permanent program being developed/established in 2025 will be the best place to find more detail about setting up the process for success.
New statewide water program similar to LUBA	<p>On page 75 IWRS says "The statewide land use program and its implementation by cities and counties is an important framework for integrating water resource issues with land use and development decisions."</p> <p>Comment: The should be a statewide water use program similar to the land use program. Right now, water use is not planned the way land is, and it should have its own program closely enmeshed with the DLCD land use program.</p>	Several actions called for in the IWRS could produce the desired outcome, if resources and attention are sufficient. Specifically, updating State Agency Coordination Programs (SACs) (Action 3B), resources for communities to update their comprehensive plans with water resources (Goal 5) and public facility (Goal 11) information, and readily available water information for decision-making (WARS update, Oregon Water Data Portal, etc).
Periodic review mandatory again	<p>On page 77 Periodic Review – The comprehensive plans should be made mandatory again. So many are out of date and out of sync with statewide planning goals and agency SACs, that they fail to achieve the vision of ensuring that each locality, in its own way and style, maintains standards the state has set. This is a legal issue of preemption, and the political subdivisions have preempted state authority.</p>	Thank you for your comment.
Population changes	<p>On page 77 Plan for Population Changes in Oregon IWRS says "Recent population projections indicate a slowing of statewide growth, compared with what Oregon has experienced in recent years."</p> <p>Comment: This is correct; notably, in the political flurry to pass SB 1537, many false statements were made regarding the various conflicting population projections. See Christopher Hall's testimony for SB 1537 on the matter of population speculation and housing.</p>	Thank you for your comment.

Expand adaption to address climate mitigation	<p>On page 78 Oregon's Climate Change Adaptation Framework IWRS says "The Framework addresses why we must adapt..."</p> <p>Comment: The problem with the term "adapt" is that it usually refers to accepting the consequences of climate change and learning to live with the negative impacts as opposed to taking action to reduce or reverse the forces causing climate change.</p> <p>Decarbonizing our society's structure and economy while also drawing down carbon from the atmosphere and water is critically important and must not become subsumed by adaptation strategies. Surely, stopping climate change will not ever be more than a partial success (if there is any at all), and that a simultaneous need for adaptation is necessary; however, focusing on the term "adaptation" is unreasonable.</p> <p>Such a focus on adaptation gives relief to the necessary requirement to stop the problems worsening climate change -- the reduction in water diversions for frivolous agriculture that is not in the greater public interest must stop. Water and land must not be separated with such impunity and the regulations on water diversions must be strengthened to ensure that land remains saturated in water. Desiccated lands cannot capture and hold carbon.</p> <p>Marshes, forests, and grasslands must not be drained and desiccated by a failure of Oregon officials to regulate water use for only the highest and best purposes.</p>	Other reviewers also noted the lack of mitigation specific actions. This topic was not covered in the 2012 or 2017 IWRS. There are many different mitigation actions recommended or proposed at many different scales across the state. Draft 2 will include reference to the documents/programs guiding mitigation (the Climate Protection Plan was challenged during Draft 1 development) and highlight some proposed actions that address mitigation. New text for Chapter 2 in Draft 2 will articulate the difference between adaptation and resilience.
Minimum streamflows needed during droughts	<p>On page 84 IWRS says "Because droughts are a slow-moving disaster where impacts develop over time, persisting even after the rain and snow returns, building drought resiliency in Oregon requires a portfolio of water management methods that are put into place long before the next drought arrives."</p> <p>Comment: Excellent summary of the problem.</p> <p>During droughts, minimum stream flows must kick in to protect watersheds from permanent damage. These minimum stream flows cannot be subject to priorities and must be CFS measurements only. Due to the successive negative impacts that occur, one after the other, the desiccation of watersheds cannot be allowed to happen in favor of growing forage crops and export crops.</p>	A comment has been added to page 84 to insert narrative to inform the reader that drought declarations currently do not provide protections for instream/ecosystems.
Re-order types of drought (most to least important)	<p>On page 85 Defining Drought</p> <p>Comment: Rank the types of drought from most to least important in order to set policy more effectively for the long-term public health, safety, and welfare.</p> <p>The human built environment relies entirely on the natural environment for survival. Therefore, the health of the natural environment must come first above all. Addressing negative impacts of Meteorological Drought followed by Hydrological and ecological droughts will protect the built environment in the long term. If we reverse priorities and desiccate the ecosystem in favor of irrigated agriculture, and to a lesser degree (less by a factor of eight) prohibiting lawns, frivolous municipal water displays and other uses such as driveway rinsing, car washing, or other low-need non-potable water uses, then we are harming the public health, safety, and welfare in the present and future.</p> <p>In order to artificially prevent Agricultural Drought, the Oregon officials impose hydrological and ecological drought. When in service to animal forage crops and export crops, such acts should be outlawed.</p> <p>As described, the impacts of drought are insidious and pernicious; they lead to long-term destruction that in some cases is irreversible. While a multi-year drought may come and go, its after effects linger in the future, some permanently.</p> <p>Socioeconomic drought must be prevented to the greatest extent possible, which includes shutting off as many non-potable water uses, especially irrigation of animal forage crops and export crops that do not feed Oregonians. Agricultural drought is an ongoing and serious problem that state officials erroneously resolve at the expense of the hydrological and ecological drought. Every year when irrigators dewater streams or reduce stream flows below a minimum for the flora and fauna to survive, the state has chosen to solve agricultural drought over hydrological and ecological drought. Agricultural drought is a fact just as drought is a fact in the eastern Oregon desert.</p>	Thank you for your comment. The order of drought descriptions does not indicate priority.
Irrigation role in drought	<p>On page 85 Impacts of Drought</p> <p>Comment: It is notable that irrigation has a substantial impact on the top three items -- Fisheries, Drinking/Potable Water, and Recreation. It's not just climate change that harms these phenomena, it's over-pumping streams and aquifers. Oregon has reached the point when and where irrigation is a bigger problem than it is a need in many situations.</p>	Thank you for your comment.
Action 6A, add example action for min streamflows	<p>On page 91 Action 6A Example Actions</p> <p>Comment: Add Minimum Stream flows Regime.</p> <p>To fight hydrological and ecological drought institute minimum stream flows since the in-stream water rights system utterly fails during the hot summer months when it is needed the most because nearly all in-stream water rights are new junior rights. The act of transforming 500 minimum stream flows to junior water rights took meaningful and effective minimum stream flows and turn them into worthless and useless junior in-stream rights.</p> <p>End the in-stream water right system for all uses where minimum stream flows during the summer are needed and keep in-stream leases for irrigators who wish to dedicate unused irrigation water to the stream to avoid losing their water rights. Also, allow irrigators to dedicate their groundwater rights inground to prevent cancellation.</p>	IWRS Action 8B calls for data to identify the quality and quantity of water needed to adequately support instream and ecosystem needs. Proposing to end the instream water rights system is beyond the scope of the IWRS. This action will be changed to 8A for Draft 2.
Ch 3 - Data & Analysis	<p>On page 95 IWRS says "Water is one of our most precious natural resources."</p> <p>Comment: Water is our most important asset we can lose. We may foul our air, mow down our forests, mine the very earth out from under our feet, and decapitate our mountaintops, but still survive in a hellscape. We destroy our water, we utterly destroy ourselves. We are water; water animates us; without water, we are jerky as is every other living creature.</p>	Thank you for your comment.
Use of the term "resource"	<p>Also, IWRS uses the term "resource."</p> <p>Comment: Change to "Sources" -- drop the "re." Use the term "Water sources."</p> <p>When I hear you say resource...I feel like you are treating me like a thing to be used, extracted and exploited.</p> <p>We must move past the era of reifying entities and evolve our relationship with the world around us. We must stop "othering" Nature and adopt Biospheric Values that acknowledge our bodies as the closest to water we will ever get; that what we do to water we do to ourselves and each other. The more we reify water, the more we desiccate our lives by not caring sufficiently for how we use water. Water scarcity is a result of scaring away water. Ignoring the disastrous effects of diverting too much water is made possible by calling it a resource. Please consider renaming the water use agency the Oregon Water Sources Department.</p>	Thank you for your comment. It is beyond the scope of the IWRS to eliminate the use of the word or change the Department's name.
Instream & Out-of-stream vs. "Public Interest"	<p>On page 98 IWRS says "Oregon needs to understand the quantity and quality of available water to meet instream and out-of-stream water needs in a changing climate."</p> <p>Comment: Please reword the sentence as: "Oregon needs to understand the quantity and quality of available water to serve the public interest -- the greater public health, welfare, and safety. The analyses are crucial to empowering Oregon officials to conduct their fiduciary duty to hold water in trust as required by the Public Trust Doctrine."</p>	ORS 536.220 specifically uses the terms "instream" and "out-of-stream" and this sentence is used to describe the relevant Strategy objective and associated actions.

Conjunctive Management	<p>On page 101 Groundwater – Surface Water Interaction IWRS says “Groundwater is connected to surface water, and because Oregon water law recognizes this important connection...”</p> <p>Comment: What is the alternative? Not to recognize facts, reality? In how many other instances does Oregon choose to recognize reality or choose to deny reality? Irrigation causes significant negative impacts to the ecosystem and in too many cases, harms the public health, safety, and welfare. Given that vast amounts of water use by irrigators, the 1.5% return on GDP is not worth so much destruction and harm, both to the present and future.</p> <p>Does Oregon choose to ignore these facts -- this reality? If so, does Oregon make a political decision based on the decades-long influence pressure from powerful lobbies. Does Oregon gaslight the public and declare that all political realities matter and that some are equal to or greater than real realities?</p>	The science regarding the extent of groundwater and surface water connections in Oregon is relatively recent. Connectivity can vary greatly across Oregon, depending on local geologic conditions.
Eminent domain	<p>Also on page 101 IWRS says “new groundwater withdrawals must now be mitigated with a similar amount of water placed instream, to offset the impact to surface water flows.”</p> <p>Comment:</p> <p>The state must allow/ empower cities to practice eminent domain of irrigation water rights that are located closest to the city’s boundaries so that cities can buy those water rights when they need them. This forceful appropriation of those irrigation water rights would follow the laws all condemnations do, and pay fair market price or better for those water rights. If necessary, if such a condemnation sale were to put the irrigator out of business, then the city should be legally required to also buy out all the lands to which the irrigation water rights were appurtenant so the irrigator has the choice of buying a new property or starting a new business. Also include buying out the irrigator’s business as well – pay for the water right, the land, and the business as needed. Cities should sell bonds if necessary to raise the money.</p> <p>As a condition of the condemnation, the state should require all new water transfers as such to be appurtenant only to urban in-fill and not contribute to the expansion of Urban Growth Boundaries.</p>	There are many other regulatory and voluntary actions included in the Strategy that have the potential to reduce groundwater use.
Beneficial uses	<p>On page 102 Monitor and Evaluate Surface Water Quality IWRS says “...support multiple beneficial uses, including protection of public health...”</p> <p>Comment:</p> <p>Protection of public health is not a beneficial use. Beneficial uses of water may not impair or be a detriment to the public health, safety, and welfare is quite astonishing. This is a categorization error that must be fixed. Throughout Chapter 537, Appropriation of Water Generally, there are dozens of statutes that require lawful action to ensure that water uses do not impair or be a detriment to the public health, safety, and welfare. Water uses that do harm are not beneficial uses of water.</p>	Correct, public health is not a beneficial use. Text has been edited to remove "protection of public health" and replace with "domestic water supplies"
Endangered Species Act and over-pumping	<p>On page 103 IWRS says “in Oregon under the Endangered Species Act. To date, none of them have been delisted.”</p> <p>Comment:</p> <p>How much of this failure to improve conditions for fish is the result of over-pumping streams and groundwater to grow animal forage crops and crop exports that don't feed Oregonians? It's not just climate change causing the problem.</p>	There are likely many confounding factors. The IWRS recognizes human-caused impacts as well as climate change as contributing to degraded habitat.
Use of the term "Ecosystem Services"	<p>On page 104 IWRS says “Ecosystem services provide clean air, clean and abundant water, fish and wildlife habitat and other values that are generally considered public goods.”</p> <p>Comment:</p> <p>In all instance throughout the IWRS where the term “Ecosystem Services” is used, please change to say: "The ecosystem provides..." To characterize the ecosystem as providing a service is disrespectful and denigrating it as a servant to the human class/ population. Also, not "generally" considered. The ecosystem is the source of the most fundamental building blocks of the world we live in and it is only in the destruction of the ecosystem that we wonder where more blocks will come from. The notion of holding biospheric values would never align with such a posture. Such conventional wisdom terminology as "Ecosystem Services" is patronizing. It assumes a power relationship that is no longer tolerable, whereby humans dominate over nature and force it to provide services. The entirety of "man's domination over Mother Nature" lives and breathes in this regressive concept of “Ecosystem Services.” The rot of human society emanates from this core ideology that passes quite lightly as conventional wisdom.</p> <p>The phrase "Ecosystem services are the benefits that nature provides" represents a 19th century anthropocentric world view that shows little regard for the intrinsic value of nature to which humans belong. The phrase hearkens back to the British paternalism that saw everything it colonized around the world as some form of resource to consume, exploit, or extract -- be it natural, animal, or human resource.</p> <p>The IWRS cannot be let to stand for another eight years with such regressive aspirations as its guide.</p>	Statute outlining the contents of the IWRS (ORS 536.220) specifically calls for the strategy to describe "ecosystem services." However, removing the term "services" in many places in the document and using "The ecosystem provides..." appears to retain the intent. The suggested edit has been made in several places, however there are still some locations that retain the term and have been flagged for further review.
Meter all 7,000 irrigation wells	<p>On page 106 Well Location Data Gaps IWRS says “An estimated 230,000 such wells exist today, with several thousand more drilled each year.”</p> <p>Comment:</p> <p>Exempt domestic wells are only 3% of all pumped groundwater. IWRS should put this quarter-million number of wells in the right and proper context; otherwise, the numbers misrepresent the truth of such water use, and as such are misleading. Yes, the data gaps must be closed, but Oregon should first and foremost be metering every single one of the 7,000 irrigation wells that use 90% of all the groundwater pumped each year.</p>	A comment has been added to consider additional language that helps describe the context of the different types of wells in Oregon and their relative water use.
Better describe roles of Adaptation Framework and mitigation focus of OR Climate Action Commission	<p>On page 110 IWRS refers to Oregon’s Climate Change Adaptation Framework and to the Oregon Climate Action Commission</p> <p>Comment:</p> <p>The Oregon Climate Action Commission appears to relate to decarbonization and drawdown of carbon from the atmosphere, and the Oregon Climate Change Adaptation Framework focuses on adaption – are they working together. Are they partisan or cooperative? Though it is unspeakable in polite company, it's known that Republicans favor adaptation and Democrats favor decarbonization/ drawdown. How do these two groups work?</p>	The Oregon's Climate Change Adaptation Framework is a statewide document developed by many state agencies, but led by DLCD. The Framework is supposed to help guide enterprise adaptation actions and does not address climate mitigation/GHG reductions. The Climate Action Commission focuses more on tracking GHG emissions and publishing recommendations for reducing local and state emissions. The Commission meets regularly and publishes biennial reports (unlike the agency team associated with the adaptation Framework).
Action 7D, revise example action	<p>On page 114 Action 7D IWRS says “Investigate potential shifts in the hydrograph, fish distribution/life history timing and impacts to agriculture and irrigation seasons.”</p> <p>Comment:</p> <p>This is backwards -- the action should read:</p> <p>"Investigate potential shifts in the hydrograph, agriculture and irrigation seasons and impacts to fish distribution/life history timing.."</p>	Suggested edit was made.
Equity impacts of over-pumping	<p>Also on this page IWRS says “Look for equity impacts of climate change (i.e., climate justice)”</p> <p>Comment:</p> <p>And look for equity impacts of over-pumping by irrigators (i.e., water use justice). Irrigation is a direct damaging impact on rural communities, proximate cities, and watersheds with anadromous fish and other threatened species.</p>	Text has been changed to "Look for equity impacts of climate change (i.e., climate justice) and water management (i.e., water justice)"

	<p>Action 8B</p> <p>On Page 117 8B – Determine the Flows Needed to Support Instream Needs (also see 10C pg. 140) The junior status of in-stream water rights is contrary to the notion of minimum stream flows when the streams need water the most. During times when the stream is flowing well, there is no reason for the in-stream right to protect the minimum stream flows. The quintessential example of a bad policy process is how special interests ply state officials to call the ecosystem “a water user” despite the fact all water originates from the ecosystem. Then they lambaste the environment for using too much water and seek to appear balanced by supporting the hoax called in-stream water rights, which have little authority under the inequitable and archaic system of prior appropriation – almost all in-stream water rights are junior so they are useless in the hot summer months when minimum stream flows are needed the most. Oregon must reverse the damage of converting over 500 minimum stream flows to junior in-stream water rights. Minimum stream flows must be a statutory limit for each reach of stream in Oregon not to be surpassed. Minimum stream flows are the floor; a dry gravel bed cannot be the floor. All in-stream water rights must exist outside the destructive priority system and form the basis of minimum stream flows. How does a watermaster know when there is no more water left in the stream to divert? When the stream has hit its statutory limit for minimum flow. In-stream leases are great where irrigators keep their water rights from being cancelled through non-use by transferring them to in-stream. The program must be expanded to in-ground leasing for groundwater rights.</p>	<p>Thank you for your comment.</p>
<p>Business Case for Investing in Water, revise description of ag & economy</p>	<p>On page 124 Out-of-stream water uses – needs IWRS says: “Irrigated agriculture contributes significantly to the economy, food supply, and to local communities.” Comment: No, it does not – this is a falsehood. The WRC called for the publication titled The Business Case for Investing in Water in Oregon so that the case for water-based investment can help inform the IWRS update. Most notably, the report shows that irrigated agriculture uses 78% of all water diversions but returns only 1.5% of the state's GDP; whereas, all other water-dependent industry businesses use only 6% of water diversions, yet return 48% of the state's GDP. The IWRS states that “Oregon agriculture directly and indirectly contributes 686,518 jobs, \$29.71 billion in wages, \$12.12 billion in taxes, and \$2.85 billion in exports to the state.” Double counting industries two and three degrees of separation is a fallacy used to overstate the very low-performing economic value of irrigation. The Business Case lays out very clearly what a low-return investment irrigation is for Oregonians, insofar as economic value is concerned. This metric must be viewed in light of how much damage has been done by the over-appropriation of water by the state and over-pumping done by large-scale irrigators. In too many cases, large-scale irrigation over-pumping is just not worth the destruction to Oregon's water sources. Irrigation proponents use a common sleight-of-hand to pull in economic activity from other industries that are two and three degrees of separation away to artificially inflate the value of large-scale irrigation. They use this fallacy to overstate the infinitesimal economic impact produced by large-scale irrigators. This legerdemain double and triple counts that activity, which has been already counted once elsewhere in the economy. If the other water-dependent industry businesses that use only 6% of water diversions but return 48% of the state's GDP were to be extrapolated in a similar fashion, the result would be substantially over 100%, which on its face, is an absurdity. The Business Case does say on page 198 that there are non-economic reasons why irrigation is valuable; ironically, the publication relies on the following logic for supporting the argument in favor of large-scale irrigation water use:</p>	<p>A comment has been added to the draft re-visit this section of the IWRS for Draft 2.</p>
	<p>Irrigated agriculture is also deeply ingrained in Oregon's spirit and sense of place and farmers and ranchers play an important role in managing both land and water across the landscape. The authors cannot make the business case; rather, they must make a cultural heritage case for draining our aquifers, dewatering our streams, and foreclosing upon our water future. While large-scale irrigators may fashion themselves as playing “an important role in managing both land and water across the landscape,” the reality is quite different from this false Norman Rockwell portraiture. The IWRS cannot go along with the drama, which suggests that Oregonians must subsidize the destruction of their water sources to protect large-scale irrigators' way of life, especially when there are so few using so much water for so little financial return.</p>	<p>See above.</p>
	<p>Action 9B</p> <p>Action 9B --Regularly Update Out-of-Stream Water Demand Forecasts The human demand for water diversions from groundwater and streams cannot be met as water scarcity increases. New water allocations are becoming limited and water curtailments are underway in regions where there is not enough water to pump from aquifers. If food is a problem, then Oregon irrigators could grow food humans need to eat with the precious little water available. Wasting water on forage crops and export crops must come to an end as water supplies go down and demand goes up. Regions that have more water than Oregon may be the best places for agriculture, and in that case, allocating such resources nation-wide must occur, and Oregon should press for such policy. There cannot be an assumption that demand trumps supply – it's just not physically possible.</p>	<p>Thank you for your comment. The approach for the next Forecast (the last one was completed in 2015) will likely be very different in the context of water scarcity.</p>
<p>Ch 4 - Stewardship, discuss Public Trust Doctrine</p>	<p>Overall Comment: IWRS can't discuss stewardship without a full expression of the Public Trust Doctrine, which has been in place for over 2,000 years in the West and since time immemorial among Indigenous people.</p>	<p>It appears that Oregon courts have only addressed the Public Trust Doctrine in the narrow interpretation around navigable waters. A more relevant reference might be to the state's recognition of public ownership of water and wildlife and associated public trust responsibilities. New narrative has been added for Draft 2.</p>
<p>edit stewardship priorities</p>	<p>On page 131 IWRS says “All Oregonians serve as stewards of water as a public resource—managing water simultaneously for economic development, human health and safety, and for environmental protection.” Comment: Excellent Chapter on Stewardship. Reorder the water management list to be "human health and safety, environmental protection, and economic development." Economic development is in service to human health and safety, and environmental protection is the single most important act to ensure and secure our future. Wasting the environment today to aggrandize ourselves economically in the present is to put short term economic results ahead of long term stability. This chapter on stewardship goes a long way acknowledging this important value. Excellent Work. We all know the study of the kindergarten teacher who gives each student a marshmallow and says if they don't eat the first right away then they can get two. We cannot be the kid who seeks immediate self-centered gratification at the risk of our future selves. Humans take the ecology and turn it into the economy, hammer and tong. We must not let the most selfish and short-sighted among us to rule over our society with their regressive values to treat the entire ecosystem as one big bank full of wealth just waiting to be exploited. Our future requires those of us in the present who care more for others to stand up for them -- others in the future. The sad truth is that the entire ecosystem is subject to the "Tragedy of the Commons" effect, and elected and appointed officials must not let others destroy the ecosystem for their own temporary benefit. This includes not letting the private sector make an end run around the public sector by calling for water markets. The law has said we can generally be free to do what we want so long as we do not harm others -- this is not just humans in the present, it is also humans in the future and it is all the flora and fauna in the present and the future as well. We must get our priorities straight -- if not us then who?</p>	<p>Suggested edit was made, "managing water simultaneously for human health and safety, environmental protection, and economic development"</p>
	<p>Also on page 131 IWRS says “Oregon has an opportunity to integrate...” Comment: Change to fiduciary duty among officials and civic duty among the citizenry.</p>	<p>Thank you for your comment.</p>

Public Trust Doctrine	On page 134 IWRS says "Responsibility for stewarding Oregon's ecosystems, including protection and restoration, falls to all Oregonians across a broad range of local, state, federal, and tribal agencies, as well as on private landowners and local organizations." Comment: Discuss and distinguish between the fiduciary duty officials have and the civic duty the citizenry has. Discuss stewardship in the context of the Public Trust Doctrine. To ignore the Public Trust Doctrine is a political act. Either the elected and appointed officials can use it to govern or the people will. We request the IWRS use the Public Trust Doctrine.	See earlier response about the Public Trust Doctrine added for Draft 2, above.
Use of the term "Ecosystem Services"	On page 134 "Ecosystem Services" IWRS says "Healthy ecosystems provide a wide variety of benefits and services to our communities." Comment: This is a regressive way to view the ecosystem. The ecosystem is not some unpaid servant like a slave to work for humans -- its a form of institutional arrogance so that humans can point to that "nature over there" and then go exploit it. This is the ideology that has caused ecological overreach and cause so much irreparable harm. We must have some humility before nature or we will continue to reap what we sow: destruction. We must change our relationship with the ecosystem to see that we are part of it, and the more we "use" it, the more we use and abuse ourselves. We are the closest to nature we will ever get -- how does OWRD think this is going to work out if we keep thinking like 19th century colonizers that nature is out there for the taking to aggrandize ourselves?	ORS 536.220 specifically uses the term "ecosystem services"
	On page 134 IWRS says "By degrading or neglecting the natural functions of ecosystems, we risk jeopardizing our own quality of life as well as the fish and wildlife that depend on these systems." Comment: Yes -- Excellent point and examples! But...how we think and the terms we use to "other" nature, the ecosystem matter. The ecosystem, is not a servant!	See earlier responses regarding "ecosystem services."
Klamath Marsh	On page 135 IWRS says "In southern Oregon, the Klamath National Wildlife Refuges' shallow marshes, open water, and grassy uplands support one of the most biologically productive refuges within the Pacific Flyway migration route. Approximately 80 percent of the flyway's migrating waterfowl pass through the Klamath Basin on both spring and fall migrations." IWRS also says "Oregon must protect our remaining wetlands through rigorous permitting (e.g., Removal-Fill) and conservation on public and private lands." Comment: OWRD cannot approve water use for the proposed dump on the Klamath Marsh; nor can it stand by while the Aquatic Use that has rights that are time immemorial to be put at risk. The dump will severely disrupt the pacific flyway by confusing millions of birds about whether or not they've arrived at Shangri La. The smells, food source, and mayhem to migrations will be a serious permanent destruction to the marsh Aquatic Use. Birds will be eating poisons, plastics, stopping their migrations, the dump will sit like a giant tea bag in the marsh vicinity, and will wreak havoc on the sensitive ecosystem. Importing California's waste to this most important wet node of the pacific flyway is unthinkable and OWRD cannot be party to permitting it.	Thank you for your comment. This comment addresses a permitting concern, not directly relevant to the IWRS.
Expand description of forests	On page 136 Forests IWRS describes Forests Comment: Excellent description -- please add information about how forests are giant sponges that soak up water from the rain/ snow season and slow down runoff to aid infiltration to the aquifers. The sponge effect is a critically important aspect of forests. Trees are standing columns of water. They store massive amounts of water. Clear cuts desertify the watersheds and cause runoff to flood to the sea, taking with it top soil. Where there are trees, there are summer clouds.	A comment has been added to the draft to consider additional narrative describing the hydrologic role of forests.
Klamath dam removals	On page 139 Historic Klamath Dam Removal Effort IWRS says "a historic dam removal project in Oregon and California is underway." Comment: Update this in late 2024 to say the dam removals are complete, they went as planned and are in the replanting river restoration phase. Seek a quote from the Klamath River Renewal Corporation.	The Klamath dam removals section will be updated made based project status closest to the Draft 2 publication date.
Scenic Waterways Designation, expand discussion	On page 140 -- Scenic Waterways Designation Should have a much more in-depth discussion of the program -- why it was a ballot initiative instead of legislative action, what the public wanted and wants, what the program does, what it takes to expand it, and locations where it should or could be expanded.	Narrative has been modified to explain Oregonians voted to establish the program and describe the process for designation. More detail on the rules for the program are addressed under the narrative in Part 1. Note, laws, policies, and regulations will be moved to an Appendix.
	On page 140 Develop Additional Instream Protections IWRS says "In many areas of Oregon, streamflows are very low or even non-existent during late summer months, largely due to anthropogenic causes. Low streamflow conditions are further exacerbated by periods of intensive water use or drought." Comment: Finally -- a statement about anthropogenic effects...which is code for the largest water-pumping sector by a factor of eight. IWRS should be more specific and just say it: over-pumping by irrigators who were approved by the state to dewater streams and drain aquifers.	Thank you for your comment.
Allocation of Conserved Water	On page 141 Allocation of Conserved Water IWRS says "The Allocation of Conserved Water Program at the Water Resources Department allows a water user who conserves water to use a portion of the conserved water on additional lands..." Comment: Conservation is necessary, especially when irrigation efficiencies create more demand for water. -- Jevon's Paradox. The way this plays out in the Harney Basin is a good example: Every irrigator in the Harney Basin is mining groundwater, and conservation efforts are not so much to preserve water for posterity and the state as a whole as it is to extend the length of time water right holders can irrigate alfalfa before they fully drain the aquifer. This is also the central problem with the Conserved Water program, whereby increased efficiencies expand water use on other lands, thereby not conserving water. This is a similar effect as described above going on in Harney County. The 25% allotment to in-stream in the Conserved Water program is a token effort; irrigators should want to conserve water use through efficiency to protect water. sources and future of society and the environment.	Thank you for your comment.
Use "in-ground" and "out-of-ground" terminology	On page 143 Develop Additional Groundwater Protections IWRS says "...more than a third of all streams and rivers depend on groundwater, and about two-thirds of all lakes and ponds do as well." Comment: In-ground/ out-of-ground terminology must be added to the concept of in-stream/ out-of-stream because in-ground water matters to the degree it saturates the land and provides the. basis of life for the ecosystem and the human built environment.	Similar comment has been addressed earlier.
	On page 143 IWRS says "public welfare, safety, and health." Comment: The phrase should be reversed in order to conform with statutory language in ORS 537 -- "public health, safety, and welfare."	Suggested edit was made.

Voluntary Agreements, 12E	<p>On page 143 – 10E Voluntary Agreements – Also page 172 (12E)</p> <p>ORS 537.745 has never worked because irrigators have never been able to organize among themselves to voluntarily reduce their water use. The Harney Basin is the quintessential example of the term "The Tragedy of the Commons." Every irrigator in the Harney Basin is mining groundwater, and conservation efforts are not so much to preserve water for posterity and the state as a whole as it is to extend the length of time water right holders can irrigate alfalfa before they fully drain the aquifer.</p> <p>Water use must be beneficial to the entire public, not just the water user.</p> <p>The privatization of public sector duties has been fraught with many failures over the past 70 years because some public sector activities are not well-suited to the private sector, and, likely, the Voluntary Agreements under ORS 537.745 are not feasible. The Voluntary Agreement's most effective result will be stalling the WRC's approval process, which could impose Corrective Control Orders. Such an effect runs counter to the legislative intent of HB 2192, which sought to remove stalling tactics by affected water users and their lobbyists by bringing the CGWA statutes into line with the Administrative Procedures Act (APA). OWRD Director, Bill Young, and others are clear on the matter, which became law.</p>	Thank you for your comment.
	<p>If water users were serious about the content of their Voluntary Agreements, then I would expect that they would first offer those strategies and tactics as rules in the DIV 512 rule-making process. Perhaps, that is the kind of negotiation that the Sub-Basin proposal envisions: numerous non-priority areas offering up to Crane the rights to their water by voluntary means in the form of what can only be described as water right transfers. Voluntary Agreements would mostly amount to private-sector water right transfers, whereby one water user, for whatever reason (e.g.: monetary compensation), agrees to give up their water for another to use. The language of ORS 537.745 may seem innocuous on the surface, but once one looks beyond the facile interpretation of the wording, details become apparent that the statute may conflict with other statutes that require water right transfers to be authorized by the state through the water right application process in ORS 540.520 Application for change of use, place of use or point of diversion. Horse-trading water rights as part of Voluntary Agreements in the form of a shell game to avoid the statutory imposition of Corrective Control Orders by the WRC cannot be allowed because it is illegal.</p>	Thank you for your comment.
	<p>This brings up the question of whether ORS 537.745 allows a water right holder to enter into a Voluntary Agreement with one's self. The scenario is that a water right holder has multiple water rights either in proximity to each other or within the same basin, and one or more senior water rights have run dry and are worthless. The water right holder seeks to enter into a Voluntary Agreement with himself to...ready for it...forbear water use on their dried up senior water right and let their other junior water right(s) continue running. That such a scheme would be permitted while the WRC has imposed Corrective Control Provisions on the basin, which regulates off the junior water right holders first, is incomprehensible. In this scenario, an irrigator located in a CGWA where Corrective Control Provisions are in effect, or are likely to go into effect, agrees with himself to horse-trade their dead senior water right with their live junior water right, effectively transferring the seniority to the junior water right. Not only is this scheme a brazen loophole/ workaround of the WRC's imposition of Corrective Control provisions (no water is regulated off since the senior water right wasn't pumping anyway), but it is also an unlawful misappropriation of water since the so-called Voluntary Agreement is a water right transfer without a formal application to transfer the water. The OWRD must manage the water in the basin (every basin) to ensure that we do not return to the Wild West. It's problematic enough that too many of Oregon's water use policies still contain vestiges of the Wild West, not for the private sector to game the public sector and worsen those effects. While I am very much in favor of water use Place-Based Planning, that effort must be set in the context of statewide planning goals. There must be equitable conformity across the state, which the WRC and OWRD must oversee. (Water League's call for Basin Districts details this concept.) The Voluntary Agreements, as envisioned so far, appear to be a workaround to the rule of law.</p>	Thank you for your comment.
	<p>If there were any credible scenarios, and I'm not sure there are any, at a minimum, Voluntary Agreements would have to be state-enforced binding legal contracts with provisions for annual audits of metered water use so all parties have shared expectations and legal responsibilities to each other and the state. There would have to be contractual accountability to each other (among water users) and to the WRC who would oversee the contracts and those who sign onto them. There would have to be severe penalties for breaking the contracts, which would include other parties to the contracts suing each other for breach of contract (tort) followed by the WRC imposing its civil penalties in ORS 537.992 with statutory increases in those penalties and fines specific to a breach of ORS 537.745.</p> <p>The effect of the Voluntary Agreements would have to result in water use reductions equal to or in excess of the water use reductions imposed by Corrective Control Orders approved by the WRC. Why would Voluntary Agreements, crafted by irrigators who proclaim they don't understand the hydrology or science presented in DIV 512 RAC meetings, be preferable to the water management and governance offered by the professionals at the OWRD and WRC? If the outcomes were to be the same, the push by proponents for Voluntary Agreements makes no sense. The purpose, however, is likely that proponents of Voluntary Agreements hope for an easier and softer resolution in their favor that would result in greater withdrawals than permitted in the Permissible Total Withdrawals listed in the DIV 512 rules. Since such hopeful thinking is statutorily impossible, the push for Voluntary Agreements is implausible so long as the law remains in effect.</p>	Thank you for your comment.
Mandatory drinking water plans	<p>On page 151 Source Water Assessments for Public Water Systems</p> <p>Comment: Must make these assessments and plans mandatory just like comprehensive plans are mandatory. Mention the 2023 law passed to make grants to cities to buy land to protect their watersheds -- and change that law to require source water assessments and drinking water plans.</p>	On page 151 under subheading "Land Acquisition" the narrative identifies the 2023 legislation establishing a program at OWEB to award grants to water suppliers to acquire, restore, or enhance sources of drinking water.
water use efficiency & conservation	<p>On page 165 Improve Water-Use Efficiency and Water Conservation IWRS says "Water conservation, as defined in state law, is a means of eliminating waste or otherwise improving the efficiency of water use..."</p> <p>Comment: Conservation is necessary, especially when irrigation efficiencies create more demand for water – this is Jevon's Paradox. The way this plays out in the Harney Basin is a good example: Every irrigator in the Harney Basin is mining groundwater, and conservation efforts are not so much to preserve water for posterity and the state as a whole as it is to extend the length of time water right holders can irrigate alfalfa before they fully drain the aquifer. This is also the central problem with the Conserved Water program, whereby increased efficiencies expand water use on other lands, thereby not conserving water. This is a similar effect as described above going on in Harney County. The 25% allotment to in-stream in the Conserved Water program is a token effort; irrigators should want to conserve water use through efficiency to protect water. sources and future of society and the environment.</p>	Thank you for your comment.
Water conservation in homes and cities	<p>On page 165 Water Conservation within the Home and Cities</p> <p>Comment: We will never wring enough water out of the cities and suburbs to conserve our way out of aridification.</p>	Thank you for your comment.

Water conservation and agriculture	<p>On page 166 Water Conservation within Agriculture IWRS says "The potential for reduced return flow or injury to other water users are also factors to consider when designing a water conservation project. Piping, lining, or other water efficiencies can greatly reduce the quantity and rate of return flows that traditionally make their way back to the stream or groundwater reservoir."</p> <p>Comment: Oregon should change the law and not permit increased irrigation in expanded Places of Use with conserved water. Conservation must go into the ecosystem, not more arid land. To say the irrigators will refuse to increase efficiencies unless they get to irrigate more land suggests that irrigators won't use less water to benefit the greater public interest; by extension, this demonstrates how irrigators' special interests are in tension with the public interest. This tension highlights the nonbeneficial use of water as regards the public interest.</p> <p>The state should make one-time payments to reimburse the costs of new equipment to make irrigation more efficient and cancel the rest of the irrigation water right. In basins that are over-appropriated, the canceled water should forever be contributed to restore minimum stream flows. The state should use its power of eminent domain, and condemn wasteful portions of water rights that can be saved through efficiencies and pay the irrigators for that amount in the same way land is condemned through eminent domain for the greater public good/ interest. The payments should be strong incentives.</p>	Thank you for your comment.
Eminent domain for minimum stream flows	<p>Eminent domain is used for large public infrastructure, of which minimum stream flows in our rivers is just such infrastructure. Since we all agree water is hydrologically connected throughout basins, and that many basins are drained by major navigable rivers, the connected groundwater and tributaries to those big rivers are important natural environmental infrastructure that the public has a substantial interest in using and preserving. The Public Trust Doctrine will be used to argue for the state to condemn wasteful portions of water rights until the problem of over-appropriation has been resolved and minimum stream flows have been restored.</p> <p>If the state can use eminent domain for dams, it can surely use eminent domain for minimum stream flows. A stream is just a gravel road without water, and the public interest and good is in having streams be streams, not roads. If storing water is worthy of using condemnation, then so is restoring minimum stream flows.</p>	Thank you for your comment.
Water markets	<p>On page 172 – 12E Market-based approaches</p> <p>Comment: Water markets are a system of privatizing of water away from the public sector -- it's a form of enclosure, as in the enclosure of the commons. Land and water are one entity, and it took a few hundred years for the landowners to figure out how to possess water instead of just having access to its use. Privatization is one among other frontiers in the effort to privatize what remains public that began in earnest 40+ years ago.</p> <p>As with all privatization efforts, the public relations narrative is a sight to behold and exemplifies some of the very best storytelling coming out of the lobbies on behalf of those who seek to maintain control of water as it becomes an increasingly "scarce" entity (most will begin calling water a commodity).</p> <p>Aridification is driving up the value of water to be "worthy" of investment and possessory ownership. With water markets, we hear about how "scarce" water will flow to the highest and best uses and will only be used for what's most important (e.g.: most profitable to the owner/ holder). This is where the current debate is, and the subject of Water League's paper "The Beneficial Use of Water for Posterity." We've had policies shaped around the 'beneficial use of water for profit' and these policies are largely responsible for shaping the water problems we have today that threaten tomorrow. For decades, water laws have required that water use be for the highest economic purpose, and in the hands of our state agencies that Scrooge-like ideology has been to varying</p>	Thank you for your comment.
	<p>Under the water markets regime, this rapacious ideology will be as if on steroids. Unless they are willing to pay a premium, rural and urban frontline communities are not high up on the water distribution list because water will flow to whoever places the highest bids. Water scarcity strikes with flora and fauna (salmon) first, then it works its way up the class structure, starting with the poor. The effort to codify water markets into law is to ensconce water inequity into our social structure. This is the essence of how water markets are envisioned: ongoing water right transfers away from their place of use to the highestpaying locations.</p>	
	<p>In water law, water rights are usufructuary -- people who are privileged to secure them have a right to use water that flows past them in streams and underground in aquifers. Most of the water use is for commercial profit. Until recently, the laws have prevented a possessory right to hold the water as a thing like furniture, money, and real estate. These ideas are not only derived from 2,000 years ago when Justinian envisioned what we now call the Public Trust Doctrine; they also reflect the wisdom of indigenous peoples worldwide.</p>	
	<p>Commercial agriculture uses require water rights. In Oregon, as with other regions in the West, irrigation is 78% of all diverted water. Water rights have always been managed by certain criteria, such as the point of diversion, the place of use, the character of the use (what it is used for), the time when it may be used, the rate of flow, and the annual or seasonal duty (total volume of water used). These strictures were put into place in 1909 to mitigate the problem of rampant over-appropriation, or watermining.</p> <p>Miners and settlers who extirpated indigenous people and claimed stakes to land and water set the standards for our contemporary water policies. They were the folks who invented the idea that all water left in streams was a waste of water. Our state agencies and officials have come to realize how wrong this view is and worked to set minimum stream flows, prevent the draining of aquifers, and conserve water for purposes of posterity. These are equity policies. While they are not sufficiently effective, they are important first steps. As equity policies, they cut into the profits and ownership control of powerful water users and would-be "water-kings" who view every drop as a penny and seek to control the most important life-giving substance equal to the air we breathe.</p> <p>Proponents of water markets seek to reverse Oregon's water equity policies; they are the next iteration of the miners who settled the West. Othering water as a 'thing' has enabled the perspective among humans to "use," "extract," and "exploit" water. Water markets add an entirely new layer by trading water to ensure it is exploited to the highest degree possible. Water markets are the water-miners' answer to water conservation -- conserve its use to whoever can pay the most.</p>	
	<p>The lobbies for the largest water users -- irrigators -- have bristled at water conservation efforts for many decades; however, as they have begun to pump themselves out of business, they have come to realize that trying to control the public sector in their favor has become a losing proposition and that taking control of water use policies from the public sector and putting it into the private sector is the only long-term solution to maintaining their control over water as it becomes more scarce and more valuable.</p> <p>To get a better understanding of the scope of the power dynamic, generally speaking, 80% of all diverted water in the West is for irrigation, and in Oregon, only 5% of all farms account for 80% of the \$5 billion industry. A very small number of water users working in the big-ag industry have control of a vast amount of water in the West, and they aim to not only maintain control but also take greater control through the privatization efforts of establishing water markets and water banks. The greatest expression of inequity in water is the existing and proposed water market system and its sibling, water banking. Water banking is not the same as aquifer recharge; it is banking with water as if it were money.</p>	

		<p>Some of the highest-value crops are nut trees and forage crops that result in Virtual Water Exports out of state and overseas (80% of all Oregon agricultural products leave the state). When water markets concretely establish the equation water = money in a literal sense, the efforts to stop the mining of water will become ever more difficult. Since the Gold Rush era, water use has been generally promoted for economic purposes. Even by this standard, our elected and appointed officials permitted the overappropriation of rivers and aquifers. Now, however, with the direct calculation of water as a tradable commodity and the removal of water rights' designated place of use and stated purposes, water use management flows to the offices of the private sector despite the guardrails put in place by statutes that declare all water belongs to the public. Letting the free market control water use instead of our elected and appointed officials maintaining control is giving the private sector the power of governance and management over water use. This is what we mean when we say water market proponents are pushing for possessory ownership of water, away from the usufructuary model. Water League argues for a form of conservation where the nonbeneficial water use must be curtailed per the public interest, and that public sector officials must solely oversee the effort to direct water use for posterity. Water marketers argue that the free market knows better where water should flow, which is mostly to the highest income-producing users.</p> <p>We are concerned that rivers, aquifers, and frontline communities will suffer worse than at any time before under a water market regime; whereas, those with the clout to participate in the water markets will benefit. The conventional wisdom that says everyone benefits when the water user benefits has been extensively disproven and is becoming anathema to posterity as water scarcity drives the private sector's water grab. Water laws require that water use be not only beneficial to the user but also to the greater public. Water League argues that the future public has the greatest stake in the water we use in the present moment.</p> <p>We have been seeing the encroachment of the neoliberal Chicago/ Austrian School of Economics into water use since the 1960s. Indeed, the Chicago School pioneered this ideology and put it into practice upon their successful intervention in the process that installed Pinochet as the Chilean dictator. There, the so-called Chicago Boys instituted a water market regime along with other U.S.-influenced ideas that made Pinochet a murderous puppet. Water League believes that as pumpers mine water from stream beds and aquifers, we become the mine tailings.</p>	
	Water distribution	<p>On page 173 Water Distribution IWRS says "The Department's limited number of field staff is noteworthy, given the large geographic territory and responsibilities."</p> <p>Comment: Then why is the regional manager in Lane County ordering staff to crack down on small-time 1/2 acre farmers market growers when there's such bigger issues elsewhere? Why are they scanning satellite imagery and making site visits to proactively target dozens of produce growers whose limited water use is the same whether they sold the produce to their neighbors or not?</p>	Thank you for your comment.
	Water right transfers	<p>On page 174 Water Right Transfers</p> <p>Comment: The state should not approve inter-basin water right transfers where surface and/ or groundwater is already over-appropriated. The effect of transferring water right from one basin to another where water is already over-appropriated has the effect of worsening over-appropriation. It has the same effect as if a new water right were permitted. At a time when all surface water appropriations have been shut down for decades, and now that groundwater allocations are also being limited due to over-appropriation, inter-basin transfers are unjustified and should be unlawful. Transferring within the basin is also problematic for the same reasons, especially if the transfer is between tributaries to a main stem river.</p> <p>The state is under no obligation to transfer water from one location to another that is over-appropriated. If a person has a water right and there's little or no water, then that's that. A water right certificate is not a right to water when it does not exist, it is only a right to water when it does exist. Over-appropriated basins are where water does not administratively exist.</p>	Applications for water right transfers have to meet an extensive list of criteria for approval. Thank you for your comment.
	Natural infrastructure	<p>On page 183 – 13A – Protect and Enhance Natural Infrastructure</p> <p>Comment: Here is the argument for natural infrastructure that is a public good/ benefit that the public has an interest in and should be the basis for eminent domain -- the state condemning water rights or portions thereof as part of the conservation of water due to increased efficiencies. See notes for 12(B) pg 166.</p>	Thank you for your comment.
	Conclusion	<p>On page 201 Conclusion IWRS Quotes: Water is a finite resource with growing demands; water scarcity is a reality in Oregon. Water-related decisions should rest on a thorough analysis of supply, the demand / need for water, the potential for increasing efficiencies and conservation, and alternative ways to meet these demands." - Policy Advisory Group (2016)</p> <p>Comment: The Policy Advisory Group left out an analysis of the required stream flows, aquifer levels, and full understanding of Natural Variability in water presence for each reach of stream and groundwater compartment.</p>	IWRS Actions 7A-7D address the needs for this data and analysis.
	grammar	<p>On page 203 Closing Thoughts IWRS says "Since 2012, the Strategy has provided Oregon with a roadmap to improving our understanding of our water resources and working towards meeting our instream and out-of-stream needs."</p> <p>Comment: Change the gerund verbs "improving" to improve, and " working" to work.</p>	Suggested edit has been made.
4	Christina Witham, Baker County	<p>Ch 3 intro page, sharing data</p> <p>The County regards the statement, <i>"This includes a commitment to thoughtful and robust data collection, analysis, and sharing information with the public and those engaged in water management and decision-making"</i> as confusing. On one hand, the commitment to robust data collection and analysis is commendable, however, on the other hand, data is not "thoughtful". Data collection is based on scientific approaches that use Quality Assurance Plans to ensure it is collected correctly and can be defended. In addition, "sharing the information with the public..." is minimizing the importance of data collected by NGOs and local governments. Instead of "sharing" information, try engaging with local governments and user groups to partner and get honest, on-the-ground information that you don't get by just "sharing".</p>	The intention for "thoughtful and robust data collection" is that where and how data is collected needs to be thoughtfully considered, especially when resources for data collection are limited.
	Ch 3, Data Integrity, p 98	<p><i>"Oregon's surface water and groundwater resources, by their very nature, are ever-changing. By day, month, and year, water and natural resources managers need up-to-date information to manage the resource and make sound decisions. This requires measurement of baseline conditions, trends over time, and evaluating the effectiveness of water monitoring programs."</i> A truer statement has never been written. Data collection must occur at the exact same location, the same day of each and every month, and be collected by a trusted source. Recently, Baker County has had an Oregon agency try to prove 'trends' over a several year hiatus, using old data, and collected by various agencies and volunteers. The data has been rejected by the County and communities.</p>	Agency resources and other factors can make it difficult to collect data at the same place and time every year. The IWRS makes several calls for steady resources to be able to collect consistent, high-quality data (Actions 7A-9B).
	Ch 3, Water Quality Standards, p 103	<p><i>"The 2022 Integrated Report identified more than 85-percent of assessed water bodies as impaired and not meeting water quality standards..."</i>. Is this because the water quality standards are unattainable in the real world?</p>	Water bodies don't meet water quality standards for a variety of reasons. Seasonally or artificially low flows from irrigation withdrawals can concentrate contaminants.
	Ch 4, Natural vs Human impacts to streamflows, p 140	<p>Statements such as <i>"In many areas of Oregon, streamflows are very low or even not-existent during late summer months, which may be exacerbated by water withdrawals for irrigation, drinking water, industrial processes, hydropower, and other beneficial uses"</i> is true, however, it neglects to mention that historically streams have gone dry during the summer months because of natural environmental circumstances</p>	The intention is that the first half of the sentence addresses the natural seasonal or intermittent nature of many streams. We also received a comment with the opposite sentiment from yours. The IWRS team will discuss if there is a better way to describe.
	Ch 4, Streamflows & impacts to water quality, p 140	<p>It's a laughable statement that says, <i>"Low streamflows often mean higher water temperatures and increased nutrient concentrations, contributing to poorer water quality."</i> That's affirmative. It's the same way flavorings in water are stronger when there's less water in the glass.</p>	The IWRS strives to be an educational resource and provide explanations for non-technical readers.

	Ch 4, TMDL's, p 167 (Action 11C summary)	Baker County's biggest concern discussed in the Strategy, is the Total Daily Maximum Load (TMDL) program. The Strategy fully supports increasing the program and developing more "programmatic implementation plans for common TMDL issues". One size does not fit all, and one solution does not fit all, especially when working with complex water issues. This program forces water users, in the name of improving water quality, to change land uses. For example, Baker County's economic driver is ag production. Should the TMDL be implemented, it has the potential to cause many ag producers and hobby farmers to go out of business. The ODEQ based their speculations on old data and decided that DNA was not required to determine where E. coli was originating. Not only is this just poor scientific effort, it also shows the determination that State agencies have to regulate land users without knowing the facts. This method of developing regulations is completely unacceptable. It's just enforcing regulations to the State, but, to us, it's the destruction of our culture and customs.	A TMDL wouldn't require changing land use. The community develops the TMDL implementation plan and the monitoring plan.
	Ch 4, Above-ground Storage, p 170	The County agrees that more above-ground water storage sites (reservoirs) need to be developed. However, we do not agree that "changing patterns of precipitation, snowpack, and heat have impacted the efficacy of existing water storage systems". It seems that even though water storage is an "integral part of Oregon's strategy to enhance public and private benefits...", the State is unwilling to pursue new above-ground water storage facilities due to lack of evaluation of potential sites. As suggested in the Strategy, existing dams should be evaluated to expand storage capacity. By raising a dam's height, removing sediment, and repairing dams where safety restrictions have required lower water levels, significant storage could be obtained without working through the quagmire of permitting that new dams require.	Extended periods of drought lead to decreased reservoir inputs from precipitation. Reduced snowpack associated with climate change reduces this source from filling the reservoirs. Increased temperatures increase evaporative losses from reservoirs.
	State role	While there are several truisms within the document, "Irrigated agriculture contributes significantly to the economy, food supply, and to local communities", "Objective water management decisions are made possible when they are based on reliable, information about water use", and "Forests are part of the essence of Oregon, and our water benefits from their sound management. However, many federal forestlands, particularly in drier regions, have massive ecological restoration needs", most of the document is devoted to developing strategies that will result in more state sponsored bureaucratic agencies regulations and control. That fact is bluntly stated, "It also means a look at more efficient ways to coordinate and partner with other agencies to carry out our shared responsibilities and modernize and streamline regulatory and enforcement processes."	A significant concern heard throughout public engagement was that agencies are not adequately enforcing existing regulations to protect public interests.
	Local & state partnering on data	Baker County suggests that instead of "providing" local governments, water control districts, and water users with data, that state agencies partner with them to promote coordination and guarantee of trusted data. It makes any project easier when there's state agency staff that lives and works within the area and has created good relationships with the local government and community residents.	This is supported by action 12F "Provide Adequate Field Presence"
	IWRS utility for everyone	Thank you for the opportunity to comment. The County hopes that you take our comments to heart and develop a IWRS that is useful to everyone, not just state agencies.	Thank you for your comment.
5	Cliff Mitchell	Instream flows and regulation, groundwater allocation, data, water metering	don't reduce or weaken existing in-stream flow direction/regulations. don't allow those individuals, cities, counties or industry to continue to obtain water from over allocated ground water basins. Don't allocate water from ground water basins until you know it will not be reduced or that it will be re-filled by current and future precipitation. If you don't have the data on ground water supplies/quantity, don't issue new drilling/water removal permits until you do. Require metering by water users and make sure the State monitors water users withdrawals.
			Thank you for your comment. The Water Resources Commission recently adopted a rulemaking to address Groundwater Allocation. Actions 7A-7D call for more water data. Action 9A "Improve Water Use Measurement and Reporting" calls for additional monitoring and Action 12F "Provide an Adequate Field Presence" outlines the importance of having adequate watermaster staff to monitor distribution.
6	David Hohler	I am writing to express my concerns and make my voice heard to ensure the 2024 version of the IWRS continues to advance water management, climate change and pathways to meet instream needs as part of Oregon's water future. As a long term clean water and ecosystem management advocate I:	
	Support ecosystem additions	· Support ecosystem additions: Support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.	Thank you for your comment.
	Support increased funding	· Support increased funding of state agencies to do water work: Full implementation of the strategy is dependent on robust funding of state agencies, as well as state agency coordination on water work. To be clear the 2024 version does put more attention on this, and deserves support.	Thank you for your comment.
	Elevate water management	· Elevate water management: OWRD must focus greater attention on water management. Rigorous, smart water management — including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future — should be front and center of any state water strategy. The 2024 version elevates attention on voluntary planning and partnerships (making it one chapter of four), but does not grant improved, smart water management the same priority or urgency.	Water management, including regulation, enforcement, and changes to policies are all included in Ch 4 "Stewardship", as water management is one way we take care of our water. The word "management" was originally included in the Ch 4 title ("Management & Stewardship"), but the Water Resources Commission suggested we remove it with the rationale that "Stewardship" encapsulates management. The IWRS project team will pursue reinstating the title "Management & Stewardship" to clarify.
	Focus on planning/dealing with climate change	· Focus on planning/dealing with climate change: The 2024 IWRS proposes to remove the stand alone subsection on climate change found in the 2017 version. While additional "example actions" have been included in the 2024 IWRS related to climate, which I support, the OWRD has removed the previous standalone subsection directing attention and action on climate change. This reorganization sends Oregon backwards and signals that climate change adaptation and resiliency is not a priority for the state's water future.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate change is a critical component to the IWRS and adaptation/ resiliency strategies are incorporated throughout. The IWRS will continue to have actions distributed throughout but add narrative to reiterate this approach.
	Restructure	· Don't abandon public engagement for staff rewrites of the IWRS: We oppose the wholesale restructuring of the IWRS. This change in direction was an internal decision that did not arise out of the minimal public engagement efforts the OWRD undertook on the update of the strategy. The 2012 IWRS was developed after years of robust and transparent public engagement, with the intent being it would serve as the cornerstone framework for future iterations. The siloed decision to rework the whole document undercuts years of work that resulted in a clear and cohesive document that addressed both instream and out-of-stream needs in a balanced manner directed by governing laws.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.
	Balance	· Bring back balance: The new iteration removes, relocates, or rewords key directives meant to ensure balanced attention to instream and out-of-stream needs. This could dilute agency and legislative attention to instream needs. The OWRD must reinstate balance into the framework.	Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely. Revisions are proposed to the framework for Draft 2 to clarify connection between chapters and objectives.
	Further engagement	· Further engagement is required: Unlike the 2012 and 2017 versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders. This siloed approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the IWRS. More work is needed.	There will be additional engagement opportunities in Fall 2024.
	Policy advisory group	· OWRD should start over by convening a policy advisory group (PAG) that is inclusive. The PAG should update the strategy following the authorizing legislation and, as in prior iterations of the IWRS, with considerable input from a wide variety of stakeholders and interests.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. A formal PAG will not be convened, however, water partners will have additional opportunities for input.

7	Dean Runyan, Board Member, WaterWatch of Oregon	Overall	It is commendable that the WRC prepares a periodic plan, but this version should be framed much more strongly as a response to climate change and the water challenges that it will create throughout Oregon.	The 2024 IWRS attempts to strengthen ties between actions and climate change by incorporating climate into the narrative of each section as well as in "example actions" for each Action. The IWRS team will consider additional ways to elevate climate throughout.
		Part 1	It is commendable that the WRC prepares a periodic water resources plan, the guidance that it provides is valuable throughout the state. This draft document, as the next version of this plan, moves in the right direction but is sorely in need of careful review and refinement. In the time I have available here are a few recommendations.	Thank you for your comment.
		Introduction	The introductory section is very disjointed and confusing. The structural elements of objectives, goals, parts and chapters are introduced and described to some degree but the relationship between them is unclear. Transitions are also unclear, it appears as if sections are missing. If nothing else a good copy editor is needed.	The IWRS project team will modify the Introduction and clarify the goals, objectives, and chapters.
		Climate Change	The inclusion of climate change as a concept is good but should be much stronger as an element of the plan. The opening of Part 1, Oregon's Water Context, should begin by describing the imperative of climate change. Climate change is the primary imperative we as a state need to deal with, not one of multiple factors that are creating "water challenges." The overall rationale of the plan should be responding to climate change.	The IWRS project team will look for ways to continue to incorporate climate change and elevate its role throughout.
		Current Challenges	In the Current Water Challenges it states: "There is too much demand for too little water." Which is true. The real imperative is that it will become much more true over time, and it is that situation that we need to deal with, not just existing "challenges."	Thank you for your comment.
		Water Policy, Management, & Budgeting	We should not hobble ourselves to maintaining business as usual with regard to water policy, management and budgeting. The statement "...the Strategy does not remove or jeopardize existing water rights or other local, state, tribal, and federal authorizations." should be omitted. Given the urgency of what we face we may need to terminate some water use approvals, negotiate changes in water allotments, or make new and different investments. It is understandable that the Strategy itself cannot make administrative or legal changes; it can however address such potential changes and make recommendations, which should be one of its objectives.	The statement that the Strategy itself cannot remove or jeopardize existing authorities is important to help people understand the scope of the document. It can (and does) call for change where change is needed, but has no legal authority.
			Finally, the entire document should be subject to a thorough review by a panel of experts and interested parties.	Thank you for your comment.
8	Don Coats	Groundwater Measurement	An inexpensive method to better understand trends in aquifer levels would be to offer subsidies for those who measure static levels of their well on a regular basis and provide the data to the State.	Thank you for your comment. Such an approach would need to consider important quality control measures.
9	Doug Heiken, Oregon Wild	Engagement	Oregon Wild supports further engagement to improve the IWRS. Unlike the previous versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders. This approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the IWRS. More work is needed.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. There will be additional engagement opportunities in the Fall of 2024.
		Balance	Oregon Wild supports balance between instream and out-of-stream uses. The new iteration removes, relocates, or rewords key directives meant to ensure balanced attention to instream and out-of-stream needs. This could dilute agency and legislative attention to instream needs. The OWRD must reinstate balance into the framework.	Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely. The IWRS team has developed proposed improvements to the framework for Draft 2.
		New Actions	Oregon Wild supports the addition of new strategic actions that advance instream, ecosystem, water quality, climate change and equity initiatives. There are still lots of streams that do not have instream water rights established.	Thank you for your comment.
		Funding	Oregon Wild supports increased funding of state agencies to do water work. Full implementation of the strategy is dependent on robust funding of state agencies, as well as state agency coordination on water work. We appreciate that the 2024 version does appear to put more attention on this.	Thank you for your comment.
		Water Management	Oregon Wild supports elevating water management as a governing policy for Oregon's water. Rigorous, smart water management — including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future — should be front and center of any state water strategy. The 2024 version elevates attention on voluntary planning and partnerships (making it one chapter of four), but does not grant improved, smart water management the same importance. Voluntary programs are great, but they only get us part way there.	Ch 2 "Partnerships & Planning" describes working across communities, local governments, state & federal agencies, and with tribes, which is necessary for plans or projects to move forward, not just voluntary actions. Water management, including regulation, enforcement, and changes to policies are all included in Ch 4 "Stewardship", as water management is one way we take care of our water. The word "management" was originally included in the Ch 4 title ("Management & Stewardship"), but the Water Resources Commission suggested we remove it with the rationale that "Stewardship" encapsulates management. The IWRS team will pursue reinstating "Management" into the Chapter 4 title.
		Need mechanism for resolving conflict	To fulfill the vision for an "integrated" water resources strategy there must be a mechanism for resolving conflicts between competing values such as increasing water storage and increasing power generation, on the one hand, and instream flows and ecological health and habitat on the other hand. The strategy must not give higher priority to consumptive and ecologically harmful uses of water, while giving lip service to ecological values.	Thank you for your comment. Conflict resolution is an inherent challenge in any water problem and will need to occur at many scales, in many unique scenarios, including statutory authority, rulemaking, and judicial decisions.
		Climate Change	Oregon Wild supports putting climate change front and center. The 2024 IWRS proposes to remove the stand alone subsection on climate change found in the 2017 version. While additional "example actions" have been included in the 2024 IWRS related to climate, which we support, the OWRD has removed the previous standalone subsection directing attention and action on climate change. This reorganization sends Oregon backwards and signals that climate change adaptation and resiliency is not a priority for the state's water future.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). The IWRS team will continue to look for ways to elevate climate issues throughout the document.
		Climate mitigation	The IWRS must address climate change mitigation as well as climate change adaptation. This means recognizing the need to maintain carbon storage and minimize GHG emissions in every water-related decision. Some farming practices will accelerate the loss of carbon stored in soil, while others may help increase soil carbon storage. Water storage in reservoirs often causes increased carbon emissions, while water storage in healthy watersheds with cool, structurally complex streams, riparian areas, and watersheds can store carbon and transport carbon for storage in the ocean. The IWRS must consider these factors in decision-making. Water management decisions should shift water use over time from activities that are more likely to emit GHG to those more likely to sequester GHG.	The 2017 IWRS did not address climate mitigation. The IWRS project team will discuss ways to address climate mitigation throughout the document.
	Restructure	Oregon Wild opposes the wholesale restructuring of the IWRS. This change in direction was an internal agency decision that did not arise out of the minimal public engagement efforts the OWRD undertook on the update of the strategy. The 2012 IWRS was developed after years of robust and transparent public engagement, with the intent being it would serve as the cornerstone framework for future iterations. The decision to rework the whole document undercuts years of work that resulted in a clear and cohesive document that addressed both instream and out-of-stream needs in a balanced manner as directed by governing laws.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.	

		Periodic review of dams	All dams should be subject periodic review by the state to ensure that they are not only safe but also serve an important purpose that justifies the hydrologic and ecological harms caused by the dam. Dams modify hydrologic function, fluvial function, and impeded movement of fish and wildlife.	OWRD does periodic reviews for dam safety, in regards to humans and property. Addressing hydrologic and ecological harms would require additional authority and resources for OWRD, ODEQ, and ODFW. 2024 IWRS Draft 1 includes Action 8A to analyze the impact of energy projects on water. This action will be renumbered to 8C in Draft 2. Narrative has been added to Action 8C and Action 13C "Support Dam & Levee Safety" to clarify the need for additional authority/resources if the program were to be expanded to assess hydrological/ecological harms.
		Peak & Ecological flows and dams	Protect peak flows and ecological flows before allowing new storage projects. There is great interest in new water storage projects which can have adverse biophysical effects. Currently the state does not protect "peak and ecological flows" when issuing new storage permits. OWRD should identify peak and ecological flows needed by fish and rivers, and to protect those flows before allowing new storage.	See Action 10C action summary sheet, it includes an example action for ODFW to modify OAR 635-400. The need to determine ecological flows is the key point of Action 8B. These need to be defined for specific streams before they can be recognized in regulatory processes.
		Muni & Irrig efficiency standards	Require water use efficiency standards for municipal and irrigation uses. Oregon's streams and rivers are already over-tapped. Requiring efficient water use is one step to meeting new demand without putting further strain on our rivers.	Municipal and Irrigation Water Management and Conservation Plans are addressed in Action 12B
		Designate new groundwater limited areas	Protect the groundwater resources that feed Oregon's lakes, rivers, and streams. The state should place a priority on the designation of new groundwater limited areas to help manage groundwater use in areas where groundwater declines are hurting water users and streams.	An example action to "designate groundwater limited areas" has been added under Action 10C "Develop Additional Groundwater Protections." Data to support groundwater protection is called for in Actions 7B "Conduct Additional Groundwater Basin Studies" and 8C "Determine Needs of Groundwater-dependent Ecosystems"
		Exempt Wells	OWRD should require permitting of "exempt wells" in groundwater limited areas and areas where groundwater feeds surface water or prevents saltwater intrusion. Currently exempt wells, even in areas where groundwater and river flow shortages are common, do not have to go through a permitting process or environmental review.	There are administrative ways to address these issues, including a critical groundwater area designation or establishing an Area Withdrawn by Commission Order. See OAR 690-200-0025, 690-200-0027, ORS 536.410, 537.735.
		Transfers Process	OWRD should conduct a "public interest review" of a transfer of a water right to ensure that when a water right holder is changing its place of use or type of use, that the state considers the effect of that change on Oregon's rivers and fish.	Opportunities to improve water rights processes are currently being explored by OWRD.
10	Edward Wolfe	Storage	There seems to be a lot of worry about flooding and flood plains, but no thought given as to how to shift that January water surplus into drought months, especially in the Cascade range. Where are the priorities for RESERVOIRS in these plans? Oregon should be constructing dozens if not hundreds of high-altitude reservoirs to collect winter and spring water to be released, pumped, piped or streamed when needed during drought months. The focus of the committee putting these priorities together is completely wrong.	Action 12D "Improve Access to Storage" describes the need for storage (reservoirs and below ground like aquifer recharge or aquifer storage and recovery).
		Part 2: Ch 4 Stewardship	Nowhere does it mention construction of water retention devices such as reservoirs and levees. There has to be a realization that water must be collected when overly plentiful to be made available when needed during drought times. Release it for salmon, use it to fight fires, relieve pressure on flood plains, pipe it for drinking water.	Action 12D "Improve Access to Storage" describes the need for storage (reservoirs and below ground like aquifer recharge or aquifer storage and recovery).
		Are your water concerns addressed by Actions 1A-14B?	The only thoughts given to water infrastructure is dam and levee removal. NOTHING about rehabilitating or constructing new water retention devices, and certainly nothing at altitude. It is a great disappointment to see where this is heading... continued water shortages during increasing drought times, and all the so called experts scratching their heads wondering what to do.	New sites for storage are discussed on Page 171 under the sub-heading "Identifying Potential Above-Ground Storage Sites." Rehabilitation options are addressed under sub-heading "Evaluating Storage Infrastructure."
11	Evan Neyland (also submitted email)	Overall	Support for ecosystem additions. I strongly support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives. Support for increased funding of state agencies to do water work. Full implementation of the strategy is dependent on robust funding of state agencies, as well as state agency coordination on water work. The 2024 version puts more attention on this, and deserves support. Elevate water management. OWRD must focus greater attention on water management. Rigorous, smart water management — including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future — should be front and center of any state water strategy. The 2024 version elevates attention on voluntary planning and partnerships (making it one chapter of four), but does not grant improved, smart water management the same gravitas or urgency. Ensure climate change is front and center. The 2024 IWRS proposes to remove the stand alone subsection on climate change found in the 2017 version. While additional "example actions" have been included in the 2024 IWRS related to climate, which I support, the OWRD has removed the previous standalone subsection directing attention and action on climate change. This reorganization sends us backwards and signals that climate change adaptation and resiliency is not a priority for the state's water future. This is the wrong message.	Water management, including regulation, enforcement, and changes to policies are all included in Ch 4 "Stewardship", as water management is one way we take care of our water. The word "management" was originally included in the Ch 4 title ("Management & Stewardship"), but the Water Resources Commission suggested we remove it with the rationale that "Stewardship" encapsulates management. In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate change is a critical component to the IWRS and adaptation/ resiliency strategies are incorporated throughout. The IWRS project team will continue to look for ways to elevate climate issues throughout the document.
		Restructure, balance, further engagement	I oppose the wholesale restructuring of the IWRS. This change in direction was an internal decision that did not arise out of the minimal public engagement efforts the OWRD undertook on the update of the strategy. The 2012 IWRS was developed after years of robust and transparent public engagement, with the intent being it would serve as the cornerstone framework for future iterations. The siloed decision to rework the whole document undercuts years of work that resulted in a clear and cohesive document that addressed both instream and out-of-stream needs in a balanced manner directed by governing laws. Bring back balance. The new iteration removes, relocates, or rewords key directives meant to ensure balanced attention to instream and out-of-stream needs. Holistic in-stream rights with an eye towards the long term will yield myriad benefits for ecosystems, fisheries, recreation, and climate change mitigation and must be a pillar of the IWRS. This change could dilute agency and legislative attention to instream needs. The OWRD must reinstate balance into the framework. Further engagement is required. Unlike the 2012 and 2017 versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders. This siloed approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the IWRS. More engagement is needed.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS. Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely. Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.
12	Evan Neyland	Ecosystem additions	Support for ecosystem additions. I strongly support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.	Thank you for your comment.
		Support increased funding	Support for increased funding of state agencies to do water work. Full implementation of the strategy is dependent on robust funding of state agencies, as well as state agency coordination on water work. The 2024 version puts more attention on this, and deserves support.	Thank you for your comment.
		Elevate water management	Elevate water management. OWRD must focus greater attention on water management. Rigorous, smart water management — including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future — should be front and center of any state water strategy. The 2024 version elevates attention on voluntary planning and partnerships (making it one chapter of four), but does not grant improved, smart water management the same gravitas or urgency.	Water management, including regulation, enforcement, and changes to policies are all included in Ch 4 "Stewardship", as water management is one way we take care of our water. The word "management" was originally included in the Ch 4 title ("Management & Stewardship"), but the Water Resources Commission suggested we remove it with the rationale that "Stewardship" encapsulates management. The word "management" will be reinstated for Draft 2.
		Climate change	Ensure climate change is front and center. The 2024 IWRS proposes to remove the stand alone subsection on climate change found in the 2017 version. While additional "example actions" have been included in the 2024 IWRS related to climate, which I support, the OWRD has removed the previous standalone subsection directing attention and action on climate change. This reorganization sends us backwards and signals that climate change adaptation and resiliency is not a priority for the state's water future. This is the wrong message.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate change is a critical component to the IWRS and adaptation/ resiliency strategies are incorporated throughout. The IWRS project team will continue to look for ways to elevate climate issues throughout the document.

		Restructure	Oppose the wholesale restructuring of the IWRS. This change in direction was an internal decision that did not arise out of the minimal public engagement efforts the OWRD undertook on the update of the strategy. The 2012 IWRS was developed after years of robust and transparent public engagement, with the intent being it would serve as the cornerstone framework for future iterations. The siloed decision to rework the whole document undercuts years of work that resulted in a clear and cohesive document that addressed both instream and out-of-stream needs in a balanced manner directed by governing laws.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.
		Balance instream and out-of-stream	Bring back balance. The new iteration removes, relocates, or rewords key directives meant to ensure balanced attention to instream and out-of-stream needs. Holistic in-stream rights with an eye towards the long term will yield myriad benefits for ecosystems, fisheries, recreation, and climate change mitigation and must be a pillar of the IWRS. This change could dilute agency and legislative attention to instream needs. The OWRD must reinstate balance into the framework.	Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely.
		Further engagement	Further engagement is required. Unlike the 2012 and 2017 versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders. This siloed approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the IWRS. More engagement is needed.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. There will be additional engagement opportunities in the Fall of 2024.
13	Gary Young		John Wesley Powell suggested all political boundaries should be based on watersheds	
		Aquifer recharge and basin/floodplains	I believe we need policies and rules that encourage aquifer recharge and large natural filtration basins/floodplains in any available area, beginning at and prioritizing the higher elevations of our watersheds, leaving the maximum opportunities for more retention at each successively lower level.	See narrative and example actions associated with Action 10A "Improve Watershed Health, Resiliency, and Capacity for Natural Storage", calling for restoration of floodplains.
		Land management/erosion management, beaver	Gravity and erosion will tend toward rapid and concentrated drainage of watersheds. Thankfully beaver and buffalo helped brake this process until they were considered more valuable skinned. Hooved grazing animals, constantly moving, herd trained by predators or otherwise, leave in their wake a lightly tilled and manured stubble, not excessively harvested, ideal for enhancing grass production and cover. Man-made means for spreading, retention and recharge are merely modern extension of the beaver's eco-knowledge.	See narrative heading "A Restoration Tool - Beaver Modified Landscapes" on page 137 of Draft 1.
		Channelization, floodplains	Artificial waterway channelization, for various purposes of convenience, has been way overdone. Compared to the 19th century, we have very little healthy functioning floodplain where waterways are constantly changing course, spreading and slowing the water, recharging our aquifers.	See narrative and example actions associated with Action 10A "Improve Watershed Health, Resiliency, and Capacity for Natural Storage" and 10B "Protect and Restore Instream Habitat and Fish Passage/Screening."
		Water retention in upper watersheds	I believe we need policies and rules that tend against rapid channelization and encourage the slowing and spreading of early spring thaw, as high in watersheds as possible. We can no longer depend on or expect a slow melt off of winter snow pack.	The Private Forest Accord calls for new rules to address several upland management issues, including stream buffers, steep slopes, etc. This is associated with Action 10A.
			https://www.bluemtnranch.com/water-concerns	
		Regenerative agriculture	Is it too late to regenerate the earth? Call of the Reed Warbler shows the way forward for the future of our food supply, our Australian landscape and our planet. This ground-breaking book will change the way we think of, farm and grow food. Author and radical farmer Charles Massy explores transformative and regenerative agriculture and the vital connection between our soil and our health. It is a story of how a grassroots revolution – a true underground insurgency – can save the planet, help turn climate change around, and build healthy people and healthy communities, pivoting significantly on our relationship with growing and consuming food.	Action 14B "Promote strategies that increase/integrate energy and water savings" includes an example action to "promote regenerative agriculture and permaculture practices"
		Regenerative agriculture	Using his personal experience as a touchstone – from an unknowing, chemical-using farmer with dead soils to a radical ecologist farmer carefully regenerating a 2000-hectare property to a state of natural health – Massy tells the real story behind industrial agriculture and the global profit-obsessed corporations driving it. He shows – through evocative stories – how innovative farmers are finding a new way and interweaves his own local landscape, its seasons and biological richness.	Thank you for your comment.
		Regenerative agriculture	At stake is not only a revolution in human health and our communities but the very survival of the planet. For farmer, backyard gardener, food buyer, health worker, policy maker and public leader alike, Call of the Reed Warbler offers a tangible path forward for the future of our food supply, our Australian landscape and our earth. It comprises a powerful and moving paean of hope.	Thank you for your comment.
14	Genny Bond	Groundwater & rural development	New rules/regs need to be adopted at the state level, to require developers of rural land to bear burden of proof that groundwater at the proposed development site is adequate to serve the proposed development. Such proof should be required to be submitted as part of the development application to the local govt. OWRD's assistance must be available to provide assessment of the documentation and direction to the local govt as to whether or not the applicant has met the burden of proof.	There is a need for more data about groundwater conditions to be able to provide this information. The IWRS identifies the need for better information about groundwater (Actions 7A-7D), as well as local governments and state agencies needing a better exchange of water information to assist with this type of question (Action 5A).
		Groundwater & rural development	Rural development possibilities include wineries with tasting rooms, agritourism venues, lodging, Measure 49 homesites, ADUs, etc., all of which typically rely on groundwater for their daily needs but also for fire prevention and protection. Such development applications commonly trigger comments from surrounding property owners who express concerns about existing groundwater levels and the impacts of proposed new development. Rural land use and development rules and statutes are adopted at the state level and don't include any way for local gov'ts to address groundwater concerns for new developments.	Local governments (cities or counties) develop comprehensive plans to guide development. The Department of Land Conservation and Development reviews and recognizes these plans. In some cases local governments have not updated their comp plans to reflect water conditions. The IWRS identifies that local governments and state agencies need a better exchange of water information to assist with this, see Action 5A and specific narrative on page 80. Calling for periodic review of local comprehensive plans could support the exchange of this information. Local government staff capacity has been identified as contributing to the challenges of updating comprehensive plans.
15	Gloria and Bob Ziller	Overall	Support ecosystem additions: Support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives. Support increased funding of state agencies to do water work: Full implementation of the strategy is dependent on robust funding of state agencies, as well as state agency coordination on water work. To be clear the 2024 version does put more attention on this, and deserves support. Elevate water management: OWRD must focus greater attention on water management. Rigorous, smart water management — including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future — should be front and center of any state water strategy. The 2024 version elevates attention on voluntary planning and partnerships (making it one chapter of four), but does not grant improved, smart water management the same gravitas or urgency.	Water management, including regulation, enforcement, and changes to policies are all included in Ch 4 "Stewardship", as water management is one way we take care of our water. The word "management" was originally included in the Ch 4 title ("Management & Stewardship"), but the Water Resources Commission suggested we remove it with the rationale that "Stewardship" encapsulates management.

		<p>Ensure climate change is front and center: The 2024 IWRS proposes to remove the stand alone subsection on climate change found in the 2017 version. While additional “example actions” have been included in the 2024 IWRS related to climate, which we support, the OWRD has removed the previous standalone subsection directing attention and action on climate change. This reorganization sends Oregon backwards and signals that climate change adaptation and resiliency is not a priority for the state’s water future.</p> <p>Don’t fix what isn’t broken: We oppose the wholesale restructuring of the IWRS. This change in direction was an internal decision that did not arise out of the minimal public engagement efforts the OWRD undertook on the update of the strategy. The 2012 IWRS was developed after years of robust and transparent public engagement, with the intent being it would serve as the cornerstone framework for future iterations. The siloed decision to rework the whole document undercuts years of work that resulted in a clear and cohesive document that addressed both instream and out-of-stream needs in a balanced manner directed by governing laws.</p> <p>Bring back balance: The new iteration removes, relocates, or rewords key directives meant to ensure balanced attention to instream and out-of-stream needs. This could dilute agency and legislative attention to instream needs. The OWRD must reinstate balance into the framework.</p> <p>Further engagement is required: Unlike the 2012 and 2017 versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor’s office, state and federal agencies and other stakeholders. This siloed approach is not aligned with the OWRD’s general approach to transparent public engagement, and it is inconsistent with past public engagement on the IWRS. More work is needed.</p> <p>OWRD should start over by convening a policy advisory group (PAG) that is inclusive. The PAG should update the strategy following the authorizing legislation and, as in prior iterations of the IWRS, with considerable input from a wide variety of stakeholders and interests.</p>	<p>In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate change is a critical component to the IWRS and adaptation/ resiliency strategies are incorporated throughout. The IWRS project team will continue to look for ways to elevate climate issues throughout the document.</p> <p>As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.</p> <p>Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely.</p> <p>Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.</p>	
16	Harmony Burrigh	<p>Good afternoon, Please accept these comments on the current version of the Integrated Water Resources Strategy. I am submitting these comments as an interested member of the public and do not represent anyone other than myself.</p> <p>See HB 3100 Testimony</p> <p>Better incorporate Place-Based Planning</p> <p>State role and non-state government partners, IWRS has not served strategic function</p> <p>Learn from other states</p> <p>Use IWRS to set priorities</p> <p>See Water Resources timeline</p> <p>Bill 3100 Testimony</p>	<p>In the 2023 legislative session, a bill (HB 3100) was introduced to make improvements to the statutory direction for the Integrated Water Resources Strategy. Amended bill language was ultimately included in the omnibus Bipartisan Drought Resilience and Water Security Package via HB 2010. Although this bill does not formally take effect until this version of the IWRS is adopted by the Water Resources Commission, there were important changes made to the statute that, if implemented, could strengthen the statewide strategy. Attached to this email are comments that were submitted by myself as testimony on the proposed bill language and amendments, that highlight the areas where the IWRS could still stand to be strengthened. Several key aspects of the original language that sought to address weaknesses in the Strategy ultimately did not get adopted due to the concerns of a small subset of stakeholder groups. In addition to the attached, I offer the</p> <p>1. State recognized place-based integrated water resources plans are not meaningfully incorporated into the Strategy. I was the planning coordinator for the Oregon Water Resources Department from 2015-2021. During that time the state partnered with four communities to develop state-recognized place-based integrated water resources plans. For nearly a decade the Department leadership and staff promised these communities that their plans would help to inform and would be reflected in the statewide strategy. The place-based planning guidelines state that "The Water Resources Commission will ultimately make the final decision about whether to formally accept a place-based plan as a component of the Integrated Water Resources Strategy." Although the plans have been recognized by the Commission, it appears that they have not been incorporated in any meaningful way into the statewide strategy. What is the purpose of place-based planning if not to implement the statewide strategy at a basin scale and also inform how the state can actually achieve integrated and coordinated management? Action: Please incorporate state-recognized place-based plans in the statewide strategy. At a minimum show where place-based strategies and actions comport with or differ from proposed statewide actions.</p> <p>2. The IWRS has become more focused on agencies and runs the risk of becoming an agency-centric strategy rather than a strategy for all Oregonians. Agencies undoubtedly play an important role in water management in Oregon, but if we are to successfully manage our water resources, it will require integrated and coordinated action with many different sectors, not just state government. The strategy could go much further in describing how the state will work with and empower other entities who manage different aspects of water resources. We need all levels of government, tribes, water managers, instream advocates, water users, and the public to be able to see how the strategy pertains to them and can help them pursue a more secure, sustainable, and balanced water future. Over the past 10 years the IWRS has been a document that agencies point to during budget development but has not actually served a strategic function for Oregon. Action: Engage with non-state government partners to discuss how they could use the statewide strategy to support their water management efforts.</p> <p>3. Oregon used to be at the forefront when the first IWRS was developed and adopted, but now we are falling behind as a state. Most western states, and also many eastern states, are now developing and implementing state water plans and supporting regional water planning efforts that inform the updates to the state water plan. OWRD should research and publish (or commission) a comparative analysis of efforts in other states and incorporate best practices and lessons learned into our approaches. Action: Learn from other states to make our statewide strategy more useful and impactful.</p> <p>It has been the policy of the state to develop integrated and coordinated approaches to water management since 1955 (ORS 536.220), and yet we continue to fumble. Like many other Oregonians, I am deeply invested in and committed to the success of OWRD and the IWRS. I look forward to the day when we make effective use of our statewide strategy to set priorities and meaningfully guide action across diverse sectors towards a shared goal of sustainable water management.</p> <p>I'm slowly assembling a timeline with important milestones in our history that I would invite you to take a look at: https://www.sutori.com/en/story/integrated-water-resources-planning-in-oregon-full-version--wFd5VceCyQGgKwBdNGHFQ6m. There is a lot to learn from our past.</p> <p>Attachment: March 2023 House Bill 3100 Testimony</p>	<p>Thank you for your comment. The testimony provides a helpful summary of opportunities for improving the IWRS. The 2024 Draft attempts to address some weaknesses summarized from agency testimony in 2022 (e.g., lack of awareness and use of IWRS across multiple agencies), 2023 SOS Water Advisory Report, and need to increase accessibility and implementation of the IWRS.</p> <p>Recognized plans have been cross checked to see if any actions need to be added to the IWRS. The IWRS team can articulate this in the next draft. As pilots, each group had the opportunity to approach their plans differently. The plans show that the statewide IWRS framework did not provide a helpful outline for approaching their plans although many of the same problems and solutions are repeated in the statewide IWRS and the individual place-based plans. The new chapter headings in the 2024 Draft 1 IWRS use words more commonly used in the place-based plans and therefore may offer a helpful "menu" of actions to choose from. The "example action" level of detail is where the place-based plans and the IWRS may differ, as planning groups are able to get more detailed and produce strategic work plans. OWRD is currently undergoing rulemaking for the permanent place-based program, providing an opportunity to clarify the relationship between the IWRS and place-based plans.</p> <p>Public engagement also identified the need for stronger partnerships, at many scales and across many actors. The 2024 Draft 1 re-located some "partnership-centric" actions from the "Place-Based Efforts" critical action to a new critical action "Coordination & Collaboration." This reflects the foundation partnerships play in water, including but not exclusive to Place-Based Planning. Development of the IWRS 2017-2022 Progress Report revealed gaps in interagency ownership, familiarity, and relevance of the IWRS. In addition to improving the use of the IWRS by agencies as a strategic document, the IWRS project team is attempting to make the document more accessible to the public. Action Summary Sheets, new for the 2024 IWRS, identify government and non-government partners for each action to illustrate the opportunities and relevance for non-state government partners. In order for the IWRS to serve a strategic function, the IWRS must become a process rather than a static document. Ongoing communication and engagement will be critical following the adoption of the 2024 IWRS.</p> <p>Absent resources for this study, there are some important lessons from the past ~ 7 years. The IWRS needs consistent staff resources to guide and track implementation, which had been missing for several years. Unmet funding needs for data, called for beginning in the 2012 IWRS, have limited the ability of the Strategy to mature in line with other state plans. We do not yet have the full set of data needed to characterize basins in support of a regional water planning approach. The length of time to convert data and studies into products that support management decisions has not kept pace with impacts from climate change.</p> <p>Distributed responsibilities across multiple agencies, varying leadership priorities, and no accountability regarding IWRS implementation have made it difficult to sustain engagement across many agencies/partners. The dismantling of the basin planning program in the 1990's also impacts our situation today. The 2024 IWRS is positioned to break from earlier approaches (2012 and 2017) and address prioritization, targets, timelines, and accountability. These new elements will be incorporated into Draft 2.</p> <p>Thank you for this resource.</p> <p>Thank you for this resource.</p>
17	Jan Lee-Weinberg, Water Resources Commissioner	<p>Part 1, Water Governance</p> <p>Tribal Water Quality In 1994 under the Clean Water Act EPA provided a process in which tribes can set up their own water quality authorities, similar to state authorities applicable to resources within their boundaries. In Oregon the Confederated Tribes of both the Umatilla and the Warm Springs have set up those authorities as well as the complex of Coos/Umpqua/Siuslaw. That authority could be mentioned under the tribal section and tribal water authorities as well as under the federal section.</p>	<p>Primacy for states and tribal governments is mentioned under CWA description, but text has also been added under the "Tribal Water Authorities"</p>	

		Legislative Water Caucus	Legislative Water Caucus Someplace it might be good to list the legislature's new Water Caucus as a resource for working with water issues, funding, and partnering.	A placeholder to introduce the Water Caucus has been added to the beginning of Ch1, Funding
		Natural Hazards Mitigation Planning & Extreme Events	Natural Hazards Under natural hazards, NRCS provides flood repair programs. Soil and Water Conservation Districts work with NRCS and citizens in each county to provide funding and technical services.	Narrative has been added to Action 6B regarding the NRCS Emergency Watershed Protection Program, and link on 6B summary sheet
		Funding for the Oregon Water Data Portal	Water Portal The water portal is mentioned in a couple areas of the IWRS. It's in the coordination section, but maybe it should also be called out specifically in the 1-C funding section as it will be an ongoing need for resources and maybe under the data gaps section as well.	Funding for the Oregon Water Data Portal best fits under 1B "Fund water resources management activities at state agencies." An example action has been added under 1B.
		Deschutes Water Mitigation Program, Action 7B, Action 10E	Deschutes Water Mitigation Program Reference perhaps under GW section as a model or maybe in GW stewardship.	The 2001 study leading to mitigation in the Deschutes basin is mentioned in Draft 1 under "Groundwater-Surface Water Interaction" on page 101. The full name of the program has been added to the narrative. The 2021 Review of Deschutes Groundwater Mitigation Program Report is listed as a resource on the Action 7B summary sheet. The program has also been added to the Action 10E action summary.
		Instream Water Rights Act, p26	Instream Water Rights Act The IWRA of 1987 had two sections, as a compromise to pass the bill. In addition to setting up a foundation for instream water rights, the legislation also set up "reservations of water for economic development." Those reservations are not mentioned in regard to the act on page 26 although they were a part of it. They are mentioned in storage and water management. It might be good to state when referring to that act that it included two major policy directions.	Narrative has been added describing the reservations component to the description under "Instream Water Rights Act" on page 26. Mention of the Instream Water Right Act has been added on page 171 under "Evaluating Reservations for Storage."
			In fact, the IWR bill was going down based on vote counts so this compromise allowed it to pass by a narrow margin.	Thank you for this context.
18	Jean Edwards	Groundwater	The situation for groundwater is critical in many areas and getting worse statewide. We want Oregon Water Resources department to its job and not grant further rights unless and until water is confirmed as available. Users will need to pay for necessary data collection unless the legislature does. Those are the 2 choices. Thank you for the opportunity to comment	Thank you for your comment. The Department has recently completed the Groundwater Allocation rulemaking to address future requests for groundwater permits (September Water Resources Commission meeting)
19	Jeffry Gottfried	Groundwater Allocation	The time is long overdue to stop the practice of giving out ground water permits for proposed housing developments , agriculture and interests other than protecting the quality , quantity and temperature of Central Oregon Rivers. These rivers are "plumbed" by lava tubes that connect to rivers like the Crooked, Deschutes and Whychus Cr. Each , so -called underground water right robs waterways if needed cold water that supports salmon, steelhead, red-band rainbow and whitefish. I urge you to address these issues and prioritize nature:fish and wildlife and stop turning a blind eye to the interconnectedness of Central Oregon's water.	Thank you for your comment. The Department has recently completed the Groundwater Allocation rulemaking to address future requests for groundwater permits (September Water Resources Commission meeting)
20	Jerry Linder, Oregon Association of Clean Water Agencies		Thank you for the opportunity to provide comments on the Draft 2024 Integrated Water Resources Strategy Framework and Actions (IWRS). These comments are provided on behalf of the Oregon Association of Clean Water Agencies (ACWA), which is a not-for-profit organization of Oregon's wastewater treatment and stormwater management utilities, along with associated professional consulting firms, dedicated to protecting and enhancing Oregon's water quality. Our members provide wastewater and stormwater services to over 3 million Oregonians, serving over 75% of Oregon's homes and businesses. ACWA shares with the Oregon Water Resources Department (WRD) the mission of protecting and enhancing Oregon's water quality (the "Mission"). ACWA's members have meaningful involvement and influence in nearly every Action area set out in the IWRS, including implementing water reuse strategies, groundwater and stormwater/surface water management, a focus on green infrastructure, in-stream flow enhancement using treated clean water from wastewater treatment plants, streamside tree-planting to reduce temperature, TMDL implementation, research partnerships, data collection, toxics reduction strategies, and Clean Water Act permit compliance. ACWA strongly supports the strategies and actions identified in the IWRS.	Thank you for your comment.
		Overall, Part 1	As an overall comment, the IWRS does a magnificent job of setting out the history, background, and regulatory context within which Oregon's water challenges can be solved. Key stakeholders and their roles in affecting the various strategies are clearly identified. Most importantly, <i>the strategies identified are the strategies needed</i> to protect and improve both water quantity and quality. The vision of what needs to be done and can be done to protect and beneficially use Oregon's water for the next 100 years (the "Water Vision") is inspirational. ACWA is particularly enthusiastic about the inclusion and recognition of the importance of reuse water as a critical component for the long-term success of the IWRS and the need for supportive regulation to allow reuse to serve its many purposes.	Thank you for your comment.
		Priorities, timelines, metrics	A second overall comment regarding the strategies set forth is that a nice job is done of setting out the sorts of actions that should be considered by State agencies to advance the Water Vision. The challenge that ACWA would like to see elaborated is how the Water Vision drives agency priorities. How does the Water Vision fit into the actions of State agencies in such a way to drive budget and individual program plans to ensure adequate funding and support? ACWA suggests adding, at a minimum, suggested implementation paths that <i>include timelines and metrics</i> , that not only inform agency priorities but that lead to both immediate and long-term action. In short, how do we get from here to there? More specifically, ACWA would suggest including more detail about the type of planning, infrastructure, <i>prioritized</i> critical areas of funding and state investment, and the type of regulatory approaches that will move the IWRS forward. It is critical to our shared Mission to see the Water Vision not only be clearly annunciated but, more importantly, implemented.	Following the release of Draft 1 of the 2024 IWRS, the Governor's Natural Resource Office and six agency directors identified action priorities for the next 5-7 years. These priorities will be reflected in Draft 2. A new requirement for the IWRS is to develop an interagency work plan which will provide a new avenue for linking actions with timelines and metrics.
			ACWA also has some specific comments:	
		Action 2A. Promote Community Education and Outreach	In addition to drinking water providers, the IWRS should recognize wastewater utilities and cities (most of whom are ACWA member agencies) for their contributions to public outreach and education. Some programs offer interpretative centers, tours, K-12 programs, and college field trips and internships. The state agencies promoting Action 2A should identify opportunities to network with, support, and draw from wastewater and municipal education resources, as those programs address frequently asked questions about water quality and treatment, including important roles the public plays in protecting our water resources and affordability.	A sub-heading has been added to describe contributions from water/wastewater utility providers.
		Action 2C. Provide Career Training for the Next Generation of Water Professionals	Career training is an ACWA priority and has been and remains the top action item for the ACWA Utility Management Committee. The IWRS should include a paragraph on the benefits of a career in the water and wastewater industry, include interesting scientific and technical work, job stability, job satisfaction in protecting public health, safety, and playing a key role in improving the environment. This action could include State efforts to implement a marketing campaign with resource materials in coordination with local agencies, non-profits, etc. The materials could be used at career days and local community events. The message can be expanded to support job shadowing, internships, and other outreach efforts. Outreach to historically underserved and marginalized communities is an opportunity here that should be highlighted. Finally, partnering with community colleges to offer courses in the field should be encouraged. ACWA has had great success utilizing community college partnerships.	Narrative has been added to describe the benefits of a career in water and ww industry

		Connection between Stream Flow, Temperature and Beneficial Uses	While the IWRS certainly implies the critical connection between stream flow, temperature and beneficial uses, the connection should be made more explicit. The importance of prioritizing the actions necessary to make a difference again are recognized but need to be more concretely stated. ACWA supports the request of State funded purchase or leasing of senior water rights from willing sellers that will result in leaving cold, clean water in streams. Similarly, purchasing or leasing water rights leaving cold, clean water in streams provides a valuable compliance option for ACWA members especially when paired with reuse strategies discussed below. These actions would make a meaningful and positive difference towards attainment of temperature TMDL compliance in many watersheds.	Narrative has been added to Action 10C "Develop additional instream protections" to highlight ww/stormwater utilities' role in acquiring or leasing water rights to achieve compliance while also leaving cold water instream.
		Identify establishing instream water rights as a priority	ACWA would like the IWRS to make a more direct statement of commitment and support beyond simply indicating that the purchase of instream water rights is the policy of the State and that the State is "working" to establish instream water rights. This should be recognized as an urgent priority. Further, while it important to acknowledge the impact of prior senior water rights resulting in extreme low flow by the end of many summers, this fact should be stressed to motivate the State of Oregon to do more now, and tomorrow, and next year to deliver more cold, clean instream flows in these places.	Public engagement also identified instream flows as an urgent priority. While the IWRS has never historically prioritized actions, future drafts may include more specific priorities and targets.
			A relevant example is Johnson Creek (this creek's watershed is in portions of Clackamas and Multnomah Counties), where a junior instream water right already exists, but the summer-season flows in the upper, agricultural portion of the watershed are typically too low and too warm to support aquatic life such as juvenile coho salmon. Having a junior instream water right, all on its own, doesn't deliver even one drop of cold clean water to the stream. For many creek miles in the upper portion of the watershed, during most summer seasons the junior instream water right in Johnson Creek (1991 priority date) specifies that 4 CFS (cubic feet per second) should be in the stream in July, and 3 CFS in August, and 2 CFS in September, yet the actual flow during these months is often less than one CFS. The water which is present in the creek then is usually too warm to support juvenile coho salmon and other cold water aquatic life which is native to this watershed. If the instream flow could be increased to 3 or 4 CFS in the summer, the water temperature would certainly be much lower.	Thank you for this example. It helps to illustrate how acquiring junior instream water rights does not necessarily translate to water remaining instream.
		Identify funding sources for instream water rights	Although Action 10C identifies instream water rights as a tool for increasing or protecting instream flow, this strategy would be strengthened if it directly called for funding to be made available to purchase or lease instream water rights from willing sellers.	An example action under 10C addressess funding: "Expand education, funding opportunities, and use of voluntary programs to protect and restore streamflow, lake levels, and cold water refugia"
		Action 10E- Groundwater Management Rulemaking	Protecting groundwater is yet another ACWA priority consistent with the priorities of the IWRS. ACWA has a Groundwater Committee that would be a great technical resource to both WRD and the Oregon Department of Environment Quality (DEQ) as rulemaking progresses. ACWA requests that an ACWA representative be appointed to any groundwater Rulemaking Advisory Committee to share our scientific, technical, and practical experience.	The RAC has concluded their meetings. OWRD contacted ACWA to submit public comment on the Rulemaking before the deadline.
		Action 12C- Encourage Water Reuse Projects	ACWA is deeply appreciative of the IWRS' encouragement of the implementation of Water Reuse projects and the need for supportive legislation. Further elaboration of the benefits of reuse water is important, such as calling out the positive impact of water reuse for drought mitigation and climate resiliency. As Oregon, particularly western Oregon, faces longer and drier summers and increasing droughts, recycled water can fill a critical water resource need to maintain healthy green infrastructure essential for mitigating urban heat islands and ensuring wet season stormwater flow storage and treatment capacity – all while reducing the withdrawal pressures on local rivers and aquifers. Also, reuse water applied to agricultural uses reduce the need for stream withdrawals and will be critical to maintaining stream flows that can support beneficial uses year-round and reduce stream temperatures. As an aside, ACWA is working closely with DEQ in support of HB 2010 to advance reuse projects in Oregon and this work should be mentioned and encouraged.	Narrative has been added to elaborate on the benefits of water reuse.
		Action 12E – Reach Environmental Outcomes with Non-Regulatory Alternatives	This section should include both the City of Ashland's and the Metropolitan Wastewater Management Commission's (MWMC) water quality trading programs to meet water temperature challenges – both implemented in partnership with The Freshwater Trust. Ashland's program restores riparian vegetation in the Rogue River watershed. MWMC's program includes riparian restoration and optional stream channel restoration projects. MWMC participated in an ACWA study in partnership with the U.S. Geological Survey that assessed the impact of riparian shade on steam temperature, and concluded that the benefits of riparian shade outweigh that of mechanical cooling infrastructure.	A placeholder has been added to include the City of Ashland and MWMC programs under narrative for 12E (received same comment from MWMC)
		Action 12G -- Strengthen Water Quantity and Water Quality Permitting Programs	The IWRS should include considerations in the 2023 HB 2010 Drought Package bill, especially related to Section 22 to improve and enhance Oregon's adoption of recycled water uses. Recycled water use can be a win-win for stream habitat by reducing reliance on freshwater withdrawals and reducing total discharge of treated wastewater, maintaining a better balance of instream flows and reducing impacts of temperature, nutrients, and other water quality factors. Water quantity and water quality permits should consider these opportunities. Action 12C addresses recycled water opportunities, but the nexus with water quality permits bears repeating the potential benefits here. This section should also emphasize the water quantity considerations on withdrawals and reduced streamflows on exacerbating water quality issues, including temperature, harmful algae blooms, lower capacity to handle nonpoint runoff, like nutrients and sediment, etc.	The section heading "Recent Legislative Support" on page 168 discussed the effort DEQ is leading to identify how to enhance reuse in Oregon. The report will come out before the next draft, so we can include findings. Text has been added to link reuse to Action 12G Permitting.
			Thank you for your consideration of ACWA's comments. As discussed, ACWA's members have an interest and a meaningful impact on nearly every Action identified in the IWRS. ACWA is anxious and willing to participate in these efforts to advance toward achieving the Water Vision. If you have any questions, please do not hesitate to contact me.	Thank you for your comment.
21	John DeVoe	Overall	I know a little bit about Oregon water. I sat on the 2012 PAG for the IWRS. In that process, we hammered out a document that was durable and based on consensus. I'll not forget the time when Curtis Martin of Water for Life and I for WaterWatch negotiated and agreed on a point for the Strategy. That's the type of process that is needed but sorely lacking in this round of revisions. The proposed revisions don't reflect much public engagement or consensus building among interested parties. There has been no Policy Advisory Group. Yet the proposed revisions stray from the statutory purpose of the IWRS and greatly change its utility as a document to guide policy choices and investments. The Department seems to be attempting to reorganize and fix what wasn't broken. The reorg has unnecessarily (intentionally?) diluted many of the strengths and helpful nuances of the Strategy. I agree with the comments offered by WaterWatch of Oregon - but I also agree with April Kline of the Oregon Water Resources Congress that the process should start over and convene a policy advisory group. For rivers, John DeVoe	We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed. More extensive input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets to make the Strategy more actionable.
		Part 1	I think the proposed reorganization of the Strategy messes it up and dilutes its utility in general. That reorg thinking is carried forward here in this comment form.	The Secretary of State Water Advisory Report 2023-04, the 2017-22 IWRS Progress Report, and interagency staff survey revealed that the IWRS is not functioning as a strategic document in current form. The IWRS project team will continue to look for ways to improve the structure. Draft 2 will include changes to the Framework to improve clarity of the reorganization.
		Part 2: Ch 2 Partnerships & Planning	The Department has elevated voluntary activity at the expense of following the law and sound, smart water management. I disagree with that reordering of priorities here.	Partnerships at many scales are foundational to identifying problems, data needs, and carrying out management and stewardship actions. While some types of partnerships are voluntary (ie., place-based planning) others are not, for example, relationships between state and federal agencies, between state agencies and Tribes, and between state agencies that share regulatory and management responsibilities.
22	Kathleen Samsel	Overall, and Report on Progress	Well planned. I would like to see dates where the progress is reported to each county and the state in general.	Interest in seeing progress was also heard during public engagement, through more regular regional meetings or an interactive website. Ways to increase accountability and show progress will continue to be discussed as the IWRS is further developed.

	Are your water concerns addressed by Actions 1A-14B?	yes except for the reporting and possible allowance when a change is needed.	The new requirement for a biennial workplan provides an opportunity to respond to changes needed in action in the timeframe in between IWRS updates.
23	Kimberley Priestley, WaterWatch	Also see pdf of IWRS Draft 1 with comments	
	Background	Background: The Integrated Water Resources Strategy is the state’s blueprint for understanding and meeting Oregon’s instream and out-of-stream needs. The legislation directing the OWRD to develop the IWRS, in coordination with ODFW and ODEQ1, passed in 2009 and was very purposeful in directing that the strategy set a clear path forward for both understanding and meeting Oregon’s instream and out-of-stream water needs. The inclusion of “instream” was heavily negotiated and passed via amendment. WaterWatch participated in those negotiations, and it is our assessment the bill would not have passed without the word “instream” to ensure balance between instream and out-of-stream needs.	Thank you for your comment.
		The original 2012 IWRS was developed after roughly three years of robust and inclusive outreach and engagement. This included work of the Commission to develop issue papers to guide discussions, OWRD research and analysis of the various types of state plans/strategies from which to model the structure from, a broad based Policy Advisory Committee (PAG)2 which met over a 24 month period, an agency project team, and agency advisory group, a federal liaison group, and others. There were nearly a dozen open houses across the state that had robust attendance, as well as a multitude of opportunities for written public comment on numerous drafts of the strategy. The final product was a solid product and was meant to serve as the scaffolding for the future. As noted previously by the OWRD, “[t]he 2012 Integrated Water Resources Strategy is a 50-year roadmap that will guide agency actions for years to come” and the goals, objectives and recommended actions were designed with a 50 year horizon in mind.3	Thank you for your comment.
		The IWRS is required, by statute, to be reviewed and updated every 5 years (now 8). The law purposefully calls for an update, not a total reworking. The 2017 IWRS, by design, retained the original goals, objectives, and guiding principles from the 2012 version, and focused that update on refreshing information, filling important gaps, and shoring up or adding new recommended actions.	Thank you for your comment.
		Despite early representations to stakeholders that the 2023 update (now 2024 update) would follow suit and simply focus on filling gaps (e.g. climate change and equity), the OWRD pivoted from this path and has released a draft that wholly reworks the IWRS. This reworking was not the result of recommendations from a PAG (none was convened), other public engagement efforts4, or direction from the Water Resources Commission or the Governor’s office.	Thank you for your comment.
	General Comments	GENERAL COMMENTS: As a general matter, while we support many of the new “action” items related to data, ecosystems, water quality and climate change, we have significant concerns with the draft 2024 IWRS released for public comment, including but not limited to the wholesale restructuring of the IWRS. High level topics are noted below, detailed remarks captured in our mark-up of the 2024 IWRS draft itself.	Thank you for your comment.
	Restructure	A. RESTRUCTURING OF THE IWRS: As noted, the 2024 draft restructures the IWRS in whole. The 2024 draft changes the ordering, titles and subheadings in a manner that strips away the clear pathway to meeting the statutory directive of both understanding and meeting Oregon’s instream and out-of-stream needs. Critical guideposts that were present in the 2012 and 2017 versions have been removed, and key issues have been stripped from headings or subheadings. Action items were shuffled, and select narratives were substantially altered. While we have called this out throughout on the attached marked-up of the 2024 draft, some illustrative examples include:	Thank you for your comment.
		1. Removing “instream and out-of-stream” from headings/directives: The 2024 version removes two chapters titled “understand instream and out-of-stream needs” and “meet instream and out-of-stream needs”. The “goals” guiding the 2024 version also leave these key words out of the headings, and	The 2017 IWRS used the Objectives as chapter titles. The 2024 IWRS retains the 2017 Objectives which can be found on the Framework, and on the "Actions at a Glance" for every chapter. Critical issues have been modified to be consistent as topics and not include "actions" in them. Specifically, the critical issue "Understanding Oregon's Out-of-Stream Needs/Demands" has been simplified to "Out-of-Stream Water Needs," and "Understanding Oregon's Instream Needs/Demands" to "Instream and Ecosystem Water Needs." In other words, the objectives include verbs and critical issues more closely label the noun or topic (consistent with most 2017 critical issues). This supports consistency across all critical issues.
		simply refer to “water resources”. The importance of the words “instream and out-of-stream” cannot be overstated; these words provide an integral framework that follows the statutory mandates, and in previous versions, have heavily shaped recommendations and narratives. Adding to our concern that these words are not in the chapter or goal headings, is the fact that these words have been culled throughout the document. A word search of the 2017 IWRS found that “instream and out-of-stream” was used 119 times throughout the 190 page document; in contrast, the 2024 Draft IWRS drops usage by half, with the term “instream and out-of-stream” used only 59 times in a 221 page document.	The importance of both instream and out-of-stream needs are retained in the draft. The word "instream" appears 257 times in Draft 1, compared with 266 times in the 2017 IWRS.
		As a reminder, the words “instream and out-of-stream” were heavily negotiated as part of the bill passage, the result being that ORS 536.220 mandates that “The department shall design the strategy to meet Oregon’s instream and out-of-stream needs.” The 2012 IWRS (carried over to 2017) built a clear and easily understandable scaffolding to meet this statutory directive; the 2024 version tears this down.	2024 IWRS Draft 1 maintains that both instream and out-of-stream needs must be met. The term was missing from the "tagline" of the draft framework and has been added in a newer draft.
	Framework	2. Undoing the “tagline” of the framework so it no longer conveys the overall statutory purpose of the IWRS: As noted, the one page “framework” is the document that is heavily used as a short cut to the full strategy for legislators, decision makers and the public; as such clear language identifying what the IWRS is of critical importance. The title/tagline of the 2017 version compared to the 2024 version is as follows:	The "tagline" has been restored in the next version of the framework.
		Oregon’s 2017 Integrated Water Resources Strategy--A framework for improving our understanding of Oregon’s water resources and meeting our instream and out of stream needs, including water quantity, water quality and ecosystem needs.	This text has been restored and proposes the addition of "in the context of climate change" at the end.
		Oregon’s 2024 Integrated Water Resources Strategy Framework and Actions--Focusing on: Climate changes, population growth, land use change, economic impacts and energy demand	
		The problems of the 2024 version are self-evident; it simply does not clearly articulate what the strategy is, or what it is meant to do. Ironically, the word “water” does not even make it into the 2024 tagline, let alone the statutory direction that any strategy meet both “instream and out-of-stream” needs. One of the stated purposes for the IWRS redo was “to make the document more accessible”; this fails that metric.	The "tagline" has been restored in the next version of the framework.
	Climate Change	3. Removing the 2017 stand-alone section on “Climate Change”: While the 2024 version adds additional “actions” related to climate change, which we support, it removes the stand alone subsection devoted to climate change. As such, climate change is no longer a designated “critical issue.” What this means is there is no heading or subheading in the summary framework or table of contents to let the reader know this is a central and urgent issue in the state’s eyes. It also makes finding climate change action items difficult; the reader is left to self-navigate the 220 page document. Long story short, by removing this as a standalone subsection there is no indication that the state’s blueprint for our water future includes movement forward on climate change adaptation/resiliency actions.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate actions and narrative are now distributed among many actions to better integrate climate across the whole Strategy. The IWRS Project Team will restore a standalone narrative (but not actions) under the "Understand Pressures..." objective look for additional ways to elevate climate change on the Framework.

Planning & Partnerships	4. Elevation of "Planning and Partnerships" to an entire chapter without affording the same gravitas to other tools: The 2024 draft elevates Planning and Partnerships to a whole new chapter (one of the four). While we agree that planning has a role in moving Oregon towards a sustainable water future, it is only one tool of many. Previous iterations respected that and placed planning (specifically place based planning) together with other tools under the chapter dedicated to recommendations for meeting instream and out-of-stream needs. To elevate this one issue to a full chapter, undermines other critical tools---such as water management. ⁶ If the state is going to dedicate a full chapter to planning, it should also add full chapters to other important tools such as this.	The 2017 IWRS included three critical issues that included recommended actions centered on planning; Extreme Events, Water & Land Use, and Place-Based Efforts. The 2024 IWRS has simply located them together. Water is important to everyone and therefore people must work together to identify solutions and plan for a secure water future. The 100-Year Water Vision and recent IWRS engagement efforts consistently called for better partnerships across multiple interests and levels of government, especially between tribes and state government. Water management is a critical tool, and strong partnerships are needed to implement management
	5. Reshuffling the deck in a way that undermines instream initiatives: In places, the 2024 update has moved action items among subchapters, with some changes making no logical sense and/or worse, undercutting the very section in which they are placed. These are noted in our mark-up comments, but one illustrative example is as follows:	Thank you for your comment.
Water & Energy	Water and Energy: Statutory directive requires the IWRS to set a path to understand and meet instream and out-of-stream needs. It also requires attention to coming pressures. The 2012 scaffolding listed "Water and Energy" as one of a number of coming pressures. Under this coming pressure, the 2012/2017 IWRS included a recommended action that directed the state to "Analyze the effects on water from energy development projects and policies" sat, appropriately, under "Water and Energy". The 2024 draft inexplicably moves this out of "Water and Energy", to the data chapter's subsection "Instream and Ecosystem Water Needs". By doing so, the 2024 draft has essentially labeled hydropower projects, which generally harm rivers/ecosystems, as an instream need. This makes absolutely no sense; and worse greatly diminishes the force of instream need section to advance data that actually helps natural ecosystems not harms them.	Water is needed for hydropower facilities to function, but their negative impacts on rivers/ecosystems is also important to acknowledge. That is why the Action to "Analyze effects on water from energy development and policies" is appropriate to put in this location. As existing hydro is upgraded/modified/assessed for re-licensing, or new energy projects are proposed, impacts on instream impacts to water quantity and quality must also be considered. Discussion of hydropower in this location does not imply it is "good" for instream/ecosystems, simply a critical need for analysis. Locating all data and analysis actions in one chapter helps support implementation.
	6. Changing Titles/Changing Scope: In a number of places the 2024 draft changes titles of critical issues and example actions in ways that greatly change the scope. These are generally not identified to readers, so without reading the 2017 and 2024 strategies side by side it would be impossible for commentors to know this. Previous titles were heavily negotiated in PAGs and other transparent and inclusive conversations. One illustrative example of a changed critical issue is as follows.	The interagency IWRS project team discussed changes to critical issue and action titles in service of improving clarity. The number of action titles that
Place-Based Efforts	The 2024 draft has changed the 2017 subheading of the identified critical issue of "Place-Based Efforts" to "Support Integrated Based Planning and Other Water Planning Efforts", greatly expanding the directive. The inclusion of "Place Based Efforts" was heavily negotiated in previous iterations; and was included as one tool of many to meet instream and out-of-stream needs. Importantly, a condition of its inclusion in the original 2012 IWRS was the development of sideboards to guide the program, which were accomplished after months of work. Many of these sideboards were then passed into the law that allows funding of these Place Based Planning. By changing the title to also direct support of "other water planning efforts" the 2024 draft has greatly broadened the directive in a way that would demand state support of any kind of planning, regardless of intent, lack of sideboards, balance of stakeholders, etc. Given the IWRS is "adopted" by the Commission, the IWRS serves as an endorsement of ideas therein. As such, expanding to water planning could have significant impacts on legislative budget discussions, among other things.	The 2024 action 4A "Support Integrated Place-Based Planning and Other Water Planning Efforts" changed the 2017 action 9A to include other planning efforts to acknowledge the existing planning mechanisms including basin planning, water management conservation planning, etc (discussed in the narrative) without having to name them explicitly. The 2017 IWRS also included an action for planning outside of place-based planning. The 2017 IWRS recommended action 13C was "Invest in local or regional water planning efforts."
	An example of the changing of a title, and therefore changing of scope, of an example action is:	
Action 4B	The 2017 IWRS included a recommended action to "Coordinate implementation of existing natural resources plans". The 2024 draft has changed this "Coordinate State and Local Natural Resources Plans". This not only greatly narrows the scope of the directive (so excludes federal and tribal plans), but also elevates local plans in a way that implies states must cede and/or somehow collaborate even if these local plans contradict state direction (new accompanying narrative confirms this). The state has rejected efforts to relinquish agency autonomy to local governments; this directive conflicts with that.	The 15 state agencies providing review and input on the 2024 draft were confused by the high level 2017 action title and proposed to make it more specific and actionable. The added specificity was not intended to be exclusionary. The name of the action title can be returned to the 2017 version (but omit the word "existing") to ensure tribal and federal plans are included. Narrative will be revised to offer actionable guidance underneath an action with broad scope.
Funding	7. New funding chapter is not all inclusive as intended: The 2024 draft elevates funding to one of four chapters. The intent, as articulated at one Water Resources Commission meeting, was not only to elevate the issue but also to have all funding in one place rather than scattered throughout. Funding of state agencies to carry out the IWRS is, in our opinion, of critical importance and we support the elevation of this issue. The funding chapter also includes funding of grant and loan programs; we agree this makes sense to have a central location rather than have scattered funding directives throughout. That said, this latter point is not achieved; funding directives are not limited to Chapter 1. Funding directive tied to actions are scattered throughout the document ⁷ . The ad hoc direction of funding outside of Chapter 1 elevates some but not all the example actions, which does not seem equitable.	The funding chapter accomplishes the need for elevating the need for funding state agencies for management and project grants and loans. Every agency or grant funding need does not need to be listed to be included in this action. Many of the example actions throughout the Strategy reference resource needs that would require funding, but provide helpful detail that would be lost if rolled up into the umbrella funding actions. Funding related to water is equitable based on how it is distributed, who receives it, and who benefits from it. These principles are described at the beginning of the Strategy and repeated in example actions to remind the reader about equity considerations for that particular action.
Use of term "community"	8. Use of the term "community" as a lever for exclusion: Oregon statutes are very clear that all water in Oregon belongs to the public, and up until now the state has been very purposeful in inviting all who are interested in water to have a seat at the table. This is a policy that is found in statute and in the day to day work of the agencies. The 2024 IWRS draft moves away from this in places by narrowing previously broad 2012/2017 narratives and/or directives that included a myriad of interests to "community" ⁸ only. Regardless of intent, the effect of this is to move Oregon away from open, transparent, and inclusive discussions on water. This, in our minds, is a sea change in the state's approach to planning and decision-making. This also enables those who have been seeking (but failing) to advance local control of water a state endorsed pathway forward.	The use of the term community is intended to be inclusive and efforts were made to elevate the many ways various interests need to collaborate, thus the new critical issue "Coordination & Collaboration." The document is intentionally moving away from the use of the term "stakeholder" as it has an exclusionary and negative connotation regarding both colonialism and slavery. Statute has not been updated to avoid the use of the term. The IWRS will use "interested parties" or "water partners" to replace this term.
Action Summaries	9. One pager placement/presentation do not meet need: The 2024 version adds "one pagers" meant to synthesize information for each "action" into an easily accessible document. While we support the idea of some sort of synopsis document for the noted example actions, as executed it seems clunky and disjointed.	The agencies reviewing the document and adding example actions found it easier to have the 1-pagers immediately near the relevant text. The next draft will separate out the 1-pagers into a quick reference guide.
	Rather than develop a stand-alone synopsis at that end of the document to accompany the one page "framework" document; the 2024 version adds one pagers at the end of each critical issue within each chapter to highlight "actions". There are 15 critical issues, with 47 "actions" under which sit innumerable "example actions" spread across 200 plus page document. Long story short, rather than a one or two page synopsis document at the end that a legislator or other interested party could print out that simply has the chapter titles, critical issues, and then "actions" and then "example actions" under those, there are 47 one pagers spread across 4 chapters that are somewhat unwieldy (in current form) to navigate. ⁹	The action summaries will be moved to an appendix for Draft 2. Some context for the development of these summary sheets may be helpful. The state agencies helping to develop the 1-pagers and reviewing/revising the IWRS narrative were having a hard time with the documents being separated. They were placed close to one another for ease of updating the narrative and example actions efficiently. The 1-pagers were always intended to be compiled into a single pdf for easy reference.
	The main purpose of the one pager, as we understand it, is to provide a one page guide to the "actions", including calling out example actions. The 2024 one pagers are the only place the example actions are found. To compare, the 2012/2017 versions have a narrative for each critical issue, then within the body of those narratives pull out boxes are placed at the appropriate spots to highlight the relevant "recommended action" under which "example actions" are found. These boxes are tied directly to the places in the document where the narratives are discussing the issue and are very easy for the reader to follow. The 2024 version, on the other hand, removes any example actions from the body of the narrative. Instead, the narrative pull out boxes only identify the recommended action (though no longer called recommended action, simply action). To find the example actions tied to the "action", the reader must continue to the end of the subchapter at the end of the narrative and flip through the many one pagers to find the one they are interested in. This organizational structure that moves the example actions from the narrative squanders an easy pathway to reader comprehension and instead requires the reader to toggle back and forth and try to understand on their own what ties with what. This is especially hard to navigate on the online version.	Example actions will be added to the narrative in callout boxes for Draft 2, similar to the 2012/2017 versions.

		If the OWRD wants to offer an easier way for the reader to tie example actions to the larger umbrella action directives, we would suggest the following three things: (1) include example actions in pull out boxes with the narrative so readers can read in context (as was done in the 2012/2017 version), then in addition (2) compile a stand-alone synopsis as a companion to the one page “framework” at the end of the document (so the reader can easily print all the “short cut” documents out together), and (3) shorten that stand alone document to simply lists of example actions under each “action” without bogging down with much of what is noted below.	Recommendations have been taken here with the exception of reducing information on the 1-pagers beyond just example actions. Information about agencies and partners, and related resources are critical to advancing action implementation.
		That said, if the OWRD retains the current structure, we would ask OWRD to address the following concerns.	
Designation of Partners		Designation of partners: The OWRD has designated partners for each “action item”. These groupings often exclude key players, among them (but not limited to) “conservation groups”. These “partner” lists could result in the elevation of some but not others in legislative or other policy making forums, could lead to bias against those not named. At its core, this works against the concept of inclusivity. It also creates a barrier to those new to Oregon’s water space.	As described in the narrative, the partners list are not exhaustive and reflect input thus far. “Conservation groups” have been added to several action summary sheets as called for your comments in the full document pdf. The previous approach to not identifying relevant partners had the unintended effect of confusion about who could/should do the action, leaving no one to do the action.
		OWRD either needs to expand to include all interested parties by general groupings ¹⁰ such as tribes, conservation groups, agriculture, municipal, local governments, etc or cut altogether.	There is strong interest among the public to know what actions they can take and listing partners is one way to do this. Over 15 agencies contributed to the parties listed as lead, supporting, or partners.
Lead/Supporting Agencies		Designation of lead and supporting agencies: While we appreciate the sentiment here; in a number of places the 2024 draft misses the mark in placing agencies in one bucket or another, with key agencies being relegated to supporting or visa versa It is unclear if OWRD made these groupings internally, or if the full agency list was consulted. If not the latter, we would suggest that as follow up. We would also ask the OWRD to revisit putting lead agencies in alphabetical order as it could confuse readers as to which agencies really are leads.	All water core team state agencies provided input and review on action one-pagers. Agencies were consulted about their inclusion as either a lead or supporting agency. Acronyms are listed in alphabetical order and this intent was stated on page 33. Some last minute inclusions may not conform to alphabeticalization but will be remedied for Draft 2.
		Failing to include the statutory directives of “understanding and meeting instream and out-of-stream needs” in the one pagers: The one pagers do not include the overarching directives of the IWRS to meet instream and out of stream needs. To the extent these are supposed to be standalone guides that people will print out to use separately from the full 220 page strategy, omission of this key directive leaves the reader with no guidepost as to the overall intent of the action.	Objectives will be added to the one-pagers for Draft 2.
Background narratives		Background Narratives: The background pieces have heavily truncated background sections, and in many cases miss the mark in giving a short synopsis of what the action item is aimed at addressing. For example (one of many), Action 6A, Plan and Prepare for Drought, there are two very short paragraphs. the second reading:	Thank you for your comment.
		Drought is one of 12 hazards discussed in Oregon’s 2020 Natural Hazards Mitigation Plan (NHMP). The state will release an updated version in 2025. A drought vulnerability risk assessment will be developed in preparation for the next NHMP.	Thank you for your comment.
		Given these “one pagers” are supposed to be cheat sheets of sorts to educate decisionmakers and the public without requiring them to read the full strategy, populating the background description with a paragraph about process really serves no purpose. In other words, the process as to the NHMP update really is neither here nor there for someone wanting a quick “cheat sheet” on the effects of drought on Oregon; moreover, some of the language will be moot within a year. Recommend a reworking of all background narratives that don’t tell a story. We would also suggest that the drafting pens for these be handed to the agencies who are lead on the subject (so instream to ODFW, water quality to DEQ, etc).	Water core state agencies had extensive involvement in developing the one-pagers. The background section was initially populated with narrative from the 2017 IWRS and edited from there. The IWRS project team will continue to improve the background to provide a concise description of what the action is intended to accomplish.
Process		B. POLICY DIRECTIVES WITHOUT TRANSPARENT PUBLIC PROCESS: The IWRS is adopted by the Oregon Water Resources Commission. As such, it is used in state decision making and legislative discussions as a representation of the state position on water. The 2024 version includes a number of changes that could shape legislative policy and funding and agency action for the next 8 years. These are not emerging from transparent processes. The public is seeing these for the first time in the 220 page document released on March 4. No PAG was convened to try to come to consensus, and no substantive information sessions were held to educate the public on the recommended changes and additions. Concerns include but are not limited to:	Draft 1 of the IWRS was available to both lobbyists, special interests, and the public at the same time.
		1. Addition of policy directives absent transparent, inclusive, and open process: In a number of places the 2024 IWRS draft is directing advancement of policies that have not been advanced by agencies or agency stakeholder workgroups via public discussions (e.g. water quantity trading, adaptive transfer tools, etc). The 2024 version also revives concepts that many stakeholders worked hard to defeat in the legislature, including directives related to planning, weakening agency autonomy, and elevation of local influence ¹¹ .	The 2024 IWRS includes a description of many potential tools, and basic description of the Deschutes Water Bank. As described above, the 2017 IWRS included recommended action 13C “Invest in local or regional water planning efforts” indicating that the inclusion of planning (outside of place-based planning) is not new for 2024.
100-Year Water Vision		2. Merging the IWRS with Governor Brown’s 100 Year Water Vision into one document: The 2024 Draft IWRS states that “[t]o streamline Oregon’s water initiatives, the 2024 Strategy Combines the 100-Year Water Vision and strategy into a single document.” (pg. 2, 2024 draft). In doing so, the 2024 draft is proposing an action that is not supported by IWRS statutory directives and is advancing a policy direction that has not been publicly requested by the executive branch. The law that directs the development of the IWRS was passed in 2009. As noted, the first IWRS was adopted in 2012, with an update in 2017. The statute charged OWRD, in coordination with DEQ and ODFW, to develop the strategy to meet instream and out-of-stream needs. The 100-Year water vision, in contrast, was an initiative of Governor Brown’s and never codified in law. While there was multi-agency input; the 100-Year Water Vision development was largely led by OWEB and the Governor’s office, with the aid of Willamette Partnership and Oregon Consensus. OWRD, DEQ or ODFW, who are tasked with development of the IWRS, were not in leadership roles per se. WaterWatch was very involved in the development of both the IWRS and the 100-Year Water Vision. And while we agree that a lot of good work went into the development of the 100-Year Water Vision, and some valuable insight gained, there was never a stated purpose that this work would somehow supplant the IWRS. In fact, in 2023 the Oregon Legislature amended the statute governing the IWRS, and in doing so did not include any directives related to the 100 year water vision. We also have heard no indication from the executive branch that Governor Kotek directed this merging. Long story short, had it been the state’s intention to merge these documents, the 2023 IWRS bill would have been the place to direct this. It is also noteworthy that movement forward on the 100-Year Water Vision (referred to as Phase 2) was dependent on the formation of an advisory committee to guide the work. The Oregon Legislature failed to fund Governor Brown’s 2020 request for this work; thus, active implementation of the vision stalled. A few select projects were funded in 2021, but these were also tied to the IWRS and were projects limited in scope (e.g. Business Case for water, Water Portal, etc) and not a pathway forward to full implementation of the 100-Year Water Vision.	The 100-Year Water Vision Final Report by Oregon Consensus noted that the participants wanted their input included in the upcoming IWRS update. There was a similarity between water concerns discussed during the 100-year water vision and the IWRS engagement in 2023. OWRD was added to a leadership role in the 100-Year Water Vision late in the process. The 2024 IWRS makes no statement that the 100-Year Water Vision would “supplant the IWRS.” Because the 100-year water vision will not be advancing, the IWRS needs to provide the single place to carry forward statewide water planning.
		Despite this somewhat disjointed history, the 2024 Draft IWRS is now declaring that the two documents are merged into one. While we do not object to the use of the 100-Year Water Vision as a reference of sorts, to merge these documents into one raises concerns on a number of levels, including what appears to be selective culling of the 100-Year Water Vision to advance some but not all focus areas (e.g. planning, collaboration, infrastructure are elevated, but not ecosystems). Long story short, these documents should stand alone—to merge them dilutes the intended force of each.	The 2024 draft made several changes to elevate ecosystems, including the placement of “Healthy Ecosystems” at the front of Chapter 4. The 100-year water vision engagement and 2023 IWRS engagement strongly identified the need to support our ecosystems as the foundation on which rely.
Public Engagement		PUBLIC ENGAGEMENT: As we testified to at the June, September, November (written) and March Water Resources Commission meetings ¹² , WaterWatch has significant concerns with OWRD’s public engagement efforts on the 2024 IWRS update.	Thank you for your comment.

			Unlike the 2012 and 2017 versions that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies, water resources commissioners and others. This siloed approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the Strategy; more work is needed.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.
			CONCLUSION: While we appreciate that a lot of work went into the current draft, we would urge the state to step back, recalibrate and focus efforts on an update to the 2017 IWRS not a complete redo.	Thank you for your comment.
			Attachment: PDF of Draft 1 with comments	Some suggested edits have been incorporated into Draft 2.
24	Laurel Hines	Instream Water Rights, Instream protections for wildlife	It appears that only ODFW, and public parks can apply for in-stream water rights to protect wildlife and ecosystems. But I live in a rural community with a stream that provides benefit to wildlife and flows through several private properties. It was threatened some years ago by a Measure 37 planned subdivision, that water specialists determined would have likely diverted or destroyed the stream. Luckily Measure 49 came along and the subdivision was averted. But it seems that long existing small streams should be protected, with hotter summers and future development constantly threatening them. There are already not enough places for deer, raccoons, and other wildlife to obtain water in the dry months, and already these small streams are lessening sooner and sooner in the summer. The stream through our property used to flow all year with a relatively healthy flow, even with our neighbor having dammed some of it up for a pond about 40 years ago. Our property value would be reduced if the stream stops, but that is not my greatest concern; my greatest concern is for the wildlife and riparian area (and the owls, raccoons, birds, skunks, possums, deer, and even a bobcat that use the stream).	Yes, only ODFW, OPRD, and OWRD can apply for new instream water rights. However, individuals can voluntarily apply to transfer or lease their existing water right for instream use, or use the Allocation of Conserved Water Program to dedicate water instream. Comments have been added to the draft IWRS to clarify opportunities for individuals to support instream protections.
25	Leslie Bach	Overall	Overall, I appreciate the level of investment in the document. It appears to cover the main elements needed to support water resource management in Oregon. One concern is the lack of collaborative input from non-agency organizations and the public. The previous strategies included extensive work among a diverse group of stakeholders, however this version appears to have been developed solely by agency personnel. I feel that more extensive contributions from stakeholders is important to ensure that the effort is fully supported by all Oregonians. I would like to see further engagement as part of the revisions to the draft report. I would also like the document to further emphasize the importance of balancing water management for both in-stream (and in-situ groundwater) with the needs for out-of-stream uses. Both are covered in the document, but the idea of balance, which was fundamental to the previous versions seems to be lost in this re-structured document.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed. More extensive input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable.
		Part 1	No comments	
		Part 2: Ch 1 Funding	I strongly support increased funding for water resource management at all levels and of all types and am glad to see this well covered in the document. In general, across the entire document, it is important to emphasize the need for funding of legal and regulatory mechanisms for managing water resources along with the voluntary and place-based mechanisms. Funding of measurement and reporting is critical to this effort.	A comment has been added for the IWRS project team to think about additional places to highlight funding for legal & regulatory mechanisms. Right now, Actions 1B, 12F, and 12G are the primary places this is emphasized.
		Part 2: Ch 2 Partnerships & Planning	I appreciate the continued support and increased attention to place-based planning. In this effort it is important to ensure that any group established to develop place-based plans include representation from stakeholders with a diverse range of opinions. There is nothing specific in the actions that addresses this, and it may be covered in the guidelines, but it deserves mention in this document.	The need to include representation with a diverse range of opinions is addressed in the narrative on page 69, "The process starts by building a collaborative and inclusive process with diverse interests." Also in the blue box "Planning Principles" has a bullet that says "Includes a balanced representation of water interests."
		Part 2: Ch 3 Data & Analysis	One concern in Chapter 3 is the way that water availability is discussed. I am glad to see an update to WARS, however how that analysis is completed is critically important. The document says the following about water availability in the winter months: "However, some water is available during the winter months to allocate for storage. Figure 3-3 illustrates (in shades of purple) water availability for new uses during the month of January." This is stated without any mention of the importance of ecological flows in the winter months, or the work that was done to describe those needs and to develop methods for protecting ecological flows in the winter if and when water was allocated for out-of-stream purposes (aka "seasonally-varying flows". This statement gives the impression that there is water to spare, as if there were no instream purposes that this water provides. I suggest some additional language here to bring in the concept of ecological flows, and why the "water available" in January may not be fully available for further appropriation. That said, I appreciate the emphasis in the actions on determining instream flow needs and the water needs of Groundwater-dependent ecosystems. Overall, I am glad to see much additional attention to GDEs as an important component of groundwater management. The key will be in not only studying the water needs of GDEs, but fully incorporating water needs of GDEs in water management decisions and water availability analyses. I will be interested to see how the work on the updated Groundwater allocation rules plays out.	A comment has been added to this section of the draft. Draft 1 describes the need for data regarding ecological flows associated with Action 8B (changing to 8A in Draft 2). The IWRS project team will revise text to address ecological flows in the context of winter availability.
		Part 2: Ch 4 Stewardship	No comments	
		Do you have other questions or concerns related to this feedback?	Not at this time.	
26	Mark Rogers, Oregon Council Trout Unlimited		We have reviewed the Draft 2024 version of the Integrated Water Resources Strategy (IWRS), and believe the document requires significant revision to fully describe some of the most pressing issues and actions needed to protect and restore instream values. OCTU respectfully submits the following comments and recommendations for the IWRS team to consider:	
		Instream	1. This next iteration of the Integrated Water Resources Strategy must ensure instream flows and water quality to maintain healthy ecosystems in every region of our state. The 2024 IWRS seems to remove much of the "instream" terminology and related discussion, and OCTU disagrees with those changes. The IWRS should place a strong emphasis on instream value and ecology, not minimize or delete those considerations. As examples:	Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely.
		Action 5A Land Use Planning	a. One of the actions in Action 5A deletes "Protect natural water bodies in the course of land use decisions, such as wetlands, estuaries, groundwater aquifers, rivers, and lakes" and replaces that with "Update land use protections for water bodies incorporating best available data." OCTU disagrees with that change because protecting functioning, natural waterbodies should be a top-tier goal of the Strategy; the new language is not similar and does not have the same result.	Suggested edit has been made to retain original example action for 5A and add the proposed (redlined) new example action as an additional example action.
		Action 11B Reduce Exposure to Toxics	b. Action 11B regarding Clean Water includes a new example action of "Support programs and organizations to help communities and utilities prepare for and respond to chemical spills" but does not mention fish or aquatic communities. The authors should review the entire document and add back references to "instream" values and "fish and wildlife," and include those in new language that currently focuses on "environment" and "communities."	The term "environment" was often suggested by ODFW. The document will be reviewed for places to appropriately reference "instream" and "fish and wildlife."

		Allocation of Conserved Water Program, Irrigation Modernization	2. OCTU appreciates the references to the Allocation of Conserved Water Program (which we strongly encourage use of), but references to it in the 2024 IWRS need some adjustment. On p. 184, the document states that "In cases where a state funding source is used to finance a portion of the piping, some or all of the conserved water is allocated to remain instream, through the Allocation of Conserved Water Program at the Water Resources Department." Much as some of OCTU's members may wish that were true, the ACW program is voluntary and projects are only routed through it if the project proponent wishes to apply a project through it (often so some of the conserved water can be applied on new lands). In our view, irrigation modernization projects that use non-refundable public money should result in public benefit by legally protecting a portion of conserved water instream, but that is not always required. On the topic of irrigation modernization, we also feel that the "Water Conservation within Agriculture" discussion on p. 166 would be more accurate if it included discussion of the opportunity and importance of legally protecting conserved water instream when doing irrigation modernization projects.	The IWRS project team will look for ways to clarify/reiterate the differences between the Allocation of Conserved Water Program and programs that fund irrigation modernization (Water Projects Grants & Loans) and requirements for dedicating water instream. Projects using the Allocation of Conserved Water program receiving public funding sources must dedicate at least 25% instream. Irrigation modernization projects that are funded through Water Projects Grants & Loans do not have the instream requirement (but do rank higher for funding if providing a public benefit).
		Framework, Narrative under "Instream & Ecosystem Needs" (change from 2017)	3. The 2024 IWRS has been restructured to an unnecessary and unhelpful degree. The 2012 and 2017 versions were based on years of public engagement resulting in a clear and cohesive document. For example, the framework/chart used on p. 187 of the 2017 version of the IWRS provided a useful and digestible summary of how the document worked, and it's familiar to policymakers, agency staff, and stakeholders. The version on p. 209-210 of the 2024 Draft is significantly different and more difficult to understand because it doesn't include the same breakdown of issues, objectives, and recommendations. On the topic of restructuring the document, OCTU would recommend changing the structure of the "Instream & Ecosystem Water Needs" issue (on pp. 115-118) because both the 2017 and 2024 versions begin with a discussion of energy and navigation; in our view, the authors should begin that issue discussion with the fisheries and ecosystem health topics because that's likely the content most readers are looking for in the section.	While the 2017 Framework is familiar to some, it has not proven to be actionable. A comment has been added to the draft to consider re-ordering topics/sub-headings in the "Instream & Ecosystem Water Needs" section.
		Action 10C	4. The Background paragraph on Healthy Ecosystems Action 10C does not fully state the cause of low streamflows that cause issues for native fish. It states that in "many areas of Oregon, streamflows are very low or even non-existent during late summer months, which may be exacerbated by water withdrawals for irrigation, drinking water, industrial processes, hydropower, and other beneficial uses." In a great number of instances, the low summer streamflow (or entire lack thereof) is directly caused by consumptive use; the existing language entirely avoids that fact. We recommend clarifying that low summer streamflows are often caused by consumptive out-of-stream uses and are not merely a natural process that's "exacerbated" by them.	The draft narrative acknowledges the natural summer pattern of drought and lower flows that occur on many streams, even if no pumping is present.
		Regulation/Enforcement, Voluntary Measures (change from 2017)	5. The 2024 Draft misses opportunities to address the State's necessary role in regulatory and enforcement matters. The 2024 Draft continues the 2017 IWRS's emphasis on voluntary and collaborative efforts on water, and those voluntary projects are undeniably important. However, they're sometimes not enough to safeguard instream values and other natural resources. For example, in Action 1B (which lists water resource management efforts at state agencies that require funding), the authors should add language about water rights enforcement and regulation—which is a key role of state water managers that protects instream values and fish.	The importance of regulatory and enforcement matters are addressed in Action 12F. A bullet item describing water rights enforcement and regulation has been added to the draft narrative for Action 1B.
		Climate Change	6. The climate change subsection included in the 2017 Strategy should be included in the 2024 IWRS. The 2024 Strategy must provide renewed emphasis of the necessity to adapt to climate change for a successful strategy to sustain our water resources.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate change is a critical component to the IWRS and adaptation/ resiliency strategies are incorporated throughout. The IWRS project team will continue to look for ways to elevate climate issues throughout the document.
27	Mark Scantlebury	Overall	<p>I'm alarmed at the current suggested update of the IWRS. Originally adopted in 2012 with significant input from many conservation groups, tribes, cities, industry and other stakeholders, the IWRS is the blueprint for meeting Oregon's future instream and out-of-stream water needs. It plays a critical role in directing state priorities and legislative funding.</p> <p>I know that the IWRS is required to be reviewed and updated periodically. However, the law calls for an update, not a total reworking. For example, the 2017 version retained the original goals, objectives and guiding principles from the 2012 version, and focused that update on refreshing information, filling important gaps, and shoring up or adding new recommended actions.</p> <p>I know that stakeholders were informed early on that would also be the scope of the 2024 update. I'm a member of WaterWatch of Oregon. But, despite early representations, it appears the OWRD decided to rework the document rather than build upon the existing structure that was developed after years of inclusive, transparent, and broadly supported work.</p>	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.
			<p>This is NOT what I want as a tax payer and resident of Oregon since 1977. While I support some of the added directives, I have serious concerns that the wholesale restructuring removes fundamental headings, chapters and direction, elevates planning above keystone water management, veers from the law's directives to understand and meet both instream and out of stream needs, removes balance, and otherwise undercuts the existing IWRS — a document that has been incredibly helpful over the past decade in securing funds for agency programs and moving forward on policy initiatives.</p> <p>I agree with WaterWatch that the IWRS needs to:</p> <ul style="list-style-type: none"> •Support ecosystem additions with new actions that advance instream, ecosystem, water quality, climate change and equity initiatives. •Support increased funding of state agencies to do water work. •Elevate water management and not rely on voluntary planning and partnerships. •Ensure climate change is front and center. •Not fix what isn't broken by attempting a wholesale restructuring of the IWRS. •Bring back balance by not removing, relocating, or rewording key directives meant to ensure balanced attention to instream and out-of-stream needs. <p>I suggest OWRD start over by convening an inclusive policy advisory group (PAG). This PAG should update the strategy in accordance with the authorizing legislation and, as in prior iterations of the IWRS, with considerable input from a wide variety of stakeholders and interests.</p>	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. There will be additional engagement opportunities in the Fall of 2024.
28	Mary Lou Soscia	Overall	<ol style="list-style-type: none"> 1. Support ecosystem additions: Support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives. 2. Support increased funding off state agencies to do water work: Full implementation of the strategy is dependent on robust funding of state agencies, as well as state agency coordination on water work. The 2024 version does put more attention on this. This deserves support. 3. Elevate water management: The OWRD must focus more attention on water management. Rigorous, smart water management — including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future — should be front and center of any state water strategy. The 2024 version elevates attention on voluntary planning and partnerships, but does not grant improved, smart water management the same gravitas or urgency. 4. Climate change must be front and center: The 2024 IWRS proposes to remove the stand alone subsection on climate change found in the 2017 version. While additional "example actions" have been included in the 2024 IWRS related to climate, which we support, the OWRD has removed the previous standalone subsection directing attention and action on climate change. This reorganization sends Oregon backwards, and signals that climate change adaptation and resiliency is not a priority for the state's water future. 	<p>Water management, including regulation, enforcement, and changes to policies are all included in Ch 4 "Stewardship", as water management is one way we take care of our water. The word "management" was originally included in the Ch 4 title ("Management & Stewardship"), but the Water Resources Commission suggested we remove it with the rationale that "Stewardship" encapsulates management. The IWRS Project Team is pursuing reinstating the term "Management" in Chapter 4 for Draft 2.</p> <p>In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate change is a critical component to the IWRS and adaptation/ resiliency strategies are incorporated throughout. The IWRS project team will continue to look for ways to elevate climate issues throughout the document.</p>

			<p>5. Don't fix what isn't broken: I vehemently oppose the wholesale restructuring of the IWRS. This change in direction was an internal decision that did not arise out of the minimal public engagement efforts the OWRD undertook on the update of the IWRS. The siloed decision to rework the whole document undercuts years of work that resulted in a clear, cohesive document that addressed both instream and out-of-stream needs in a balanced manner directed by governing laws.</p> <p>6. Bring back balance: The new iteration removes, relocates, or rewords key directives meant to ensure balanced attention to instream and out-of-stream needs. This could dilute agency and legislative attention to instream needs. The OWRD must reinstate balance into the framework.</p>	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.
			<p>7. Increase public engagement and participation. Unlike the 2012 and 2017 versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation organizations, agricultural interests, municipal representatives, the governor's office, state and federal agencies and others. This siloed approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the Strategy. The OWRD should convene a policy advisory group that is inclusive of the wide variety of stakeholders and interests interested in water to shape the 2024 update.</p>	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. There will be additional engagement opportunities in the Fall of 2024.
29	Matt Stouder, Metropolitan Wastewater Management Commission	Action 2A - Promote Community Education and Outreach	In addition to drinking water providers, the IWRS needs to call out wastewater utilities and cities for their contributions to public outreach and education. Some programs offer interpretative centers, tours, K-12 programs, and college field trips and internships. The state agencies promoting Action 2A should identify opportunities to network with, support, and draw from wastewater and municipal education resources, as those programs address frequently asked questions about water quality and treatment, including important roles the public plays in protecting our water resources and affordability.	The role of utilities has been added to Action 2A narrative
		Action 2C - Provide Career Training for the Next Generation of Water	There is no language about why someone would want a career in the water and wastewater industry and compel them to enroll. This action could include state efforts to implement a marketing campaign with resource materials that local agencies, non-profits, and other outreach organizations could tap into. This would expand the scope of the state's messaging and use of statewide materials when participating in career days and offering job shadows and internships, and other outreach efforts.	Narrative has been added to address why someone might pursue a career in water/ww for Action 2C. Further discussion needed regarding a statewide marketing campaign.
		Action 12C - Encourage Water Reuse Projects	This section should be enhanced to call out the importance of water reuse for drought mitigation and climate resiliency. As Oregon, particularly western Oregon, faces longer and drier summers and increasing droughts, recycled water can fill a critical water resource need to maintain healthy green infrastructure essential for mitigating urban heat islands and ensuring wet season stormwater flow storage and treatment capacity- all while reducing the withdrawal pressures on local rivers and aquifers.	A comment has been added to the draft to insert narrative that will better link reuse and drought mitigation and climate resiliency.
		Action 12E - Reach Environmental Outcomes with Non-Regulatory Alternatives	This section needs to be updated to include both the City of Ashland's and the MWMC's water quality trading programs to meet water temperature challenges - both implemented in partnership with The Freshwater Trust. Ashland's program restores riparian vegetation in the Rogue River watershed. The MWMC's Water Quality Trading Plan was approved by DEQ in 2022 and implemented with the MWMC's renewed NPDES permit in 2022. The MWMC is a founding member of Pure Water Partners, a partnership of local drinking water utility Eugene Water & Electric Board (EWEB), several conservation organizations and the US Forest Service to protect and restore the McKenzie watershed and other upper Willamette tributaries. The MWMC's program includes riparian restoration and optional stream channel restoration projects. The MWMC participated in an Oregon Association of Clean Water Agencies study in partnership with the U.S. Geological Survey that assessed that the benefits of riparian shade outweigh that of mechanical cooling infrastructure.	Reference has been added to City of Ashland and MWMC's water quality trading programs with The Freshwater Trust.
		Action 12C Reuse and Action 12G Permitting	The 2024 IWRS should include considerations of the 2023 HB2010 Drought Package bill, especially related to Section 22 to improve and enhance Oregon's adoption of recycled water uses. Recycled water use can be a win-win for stream habitat by reducing reliance on freshwater withdrawals and reducing total discharge of treated wastewater, maintaining a better balance of instream flows, and reducing impacts of temperature, nutrients, and other water quality factors. Water quantity and water quality permits should consider these opportunities. Action 12C does address the recycled water opportunities, but the nexus with permit warrants calling out under Action 12G.	The narrative currently addresses the HB2010 under "Recent Legislative Support." Narrative currently addresses reuse and environmental restoration under "Innovative Approaches." Narrative has been added under Action 12G to call out the connection to reuse permitting.
		Action 12C Reuse	This section should also more specifically call out the water quantity considerations on withdrawals and reduced stream flows on exacerbating water quality issues, including temperature, harmful algae blooms, and lower capacity to handle nonpoint runoff, like nutrients and sediment, etc.	
30	Merry Ann Moore	Overall	<p>I fear this rewrite throws the salmonids out with the instream water. More simply, what's needed in this update is revision to the existing framework, not a wholesale rewriting of the state integrated water strategy. Here's what I support:</p> <ul style="list-style-type: none"> *The addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives. *Increased funding of state agencies to do water work. Please make sure this funding is sufficiently robust. *Greater OWRD attention on water management— including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future. Voluntary efforts to share aren't sufficient when it comes to water. *Facing the reality of climate change and putting its effects front and center. This should drive the entire strategy! The plan should signal that climate change adaptation and resiliency are top priorities in a successful water future. *Not restructuring the IWRS. The 2012 IWRS was developed after years of public engagement, with the intent of it being the cornerstone framework for future iterations. This proposed rewrite undercuts years of work that resulted in a clear and cohesive document that addressed both instream and out-of-stream needs in a balanced manner directed by governing laws. *Involvement of a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders. This is the only way to achieve balanced, fully considered and fully supported water policy. 	<p>As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.</p> <p>Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. There will be additional engagement opportunities in the Fall of 2024.</p>
		Do you have other questions or concerns related to this feedback?	See initial comments	
31	Myron Redford		I support Water Watch's position on revising your master plan.	Thank you for your comment.
32	Nancy Nichols	Part 2: Ch 1 Funding	I am concerned that funding for Watermasters is no enough to monitor and stop illegal appropriations of water.	Adequate funding and staff capacity to carry out agency water management responsibilities is called for in Action 1B and Action 12F.
33	Nathan Gehres, Applegate Partnership and Watershed Council	Education about water rights	I think that the community engagement aspect is extremely important. Very few landowners are aware of limitations (0.5 acres) on irrigation from residential wells, as several folks have moved to the area from other regions of the country.	Under "Resources" on the Action 2A summary sheet, there is a link to a help OWRD document: "Water Rights in Oregon: An Introduction to Oregon's Water Laws. A link has also been added in the narrative, with the conservation/efficiency items.

	Enforcement of water rights	A method to enforce surface water use in irrigation systems related to beneficial use and waste need to have more "teeth" as many irrigators have flaunted the existing rules for years or decades without any consequence.	Field staff are needed for water rights enforcement. The IWRS includes Action 12F "Provide Adequate Field Presence"
	Irrigation ditches	Our local irrigation ditches are very old and in disrepair, infrastructure improvement would be important to keep the system going, but will also be very expensive.	The State has funding sources available for irrigation modernization, described under Action 13A "Maintain, Upgrade, and Decommission Water and Wastewater Infrastructure"
	Groundwater	Groundwater in the region is very fragmented, and assessing what is available would be difficult to impossible to quantify with current technology.	The State continues to conduct groundwater studies throughout the state (see Action 7B)
	Irrigation ditches, public funding	Irrigation infrastructure, namely the ditches, is suffering from decades of neglect, but determining which ditches still result in beneficial use, versus landscaping or as a water feature, is difficult. Is supporting water for hobby farms and maintaining property value a good use for public funds?	Projects that apply for state funding through OWRD's Water Projects Grants & Loans & Irrigation Modernization funding must meet several public benefit criteria: https://www.oregon.gov/owrd/WRDFormsPDF/WPGL_Scoring_Criteria.pdf
	Equitable regional resources	Needs vary per region, Josephine County doesn't currently have a function soil and water conservation district and shares NRCS staff with Douglas County, while Jackson County has significantly more resources. Targeting regions that have fewer resources to fill in gaps would be beneficial.	This is a helpful example of the need for equitable distribution of technical resources. An example action has been added under 1B "Provide equitable access to technical assistance (e.g., state & federal agencies, SWCD's) for communities"
	Irrigation ditches and invasive species	Also, irrigation ditches are excellent vectors for invasive species, planning methods to mitigate that hazard would be good.	The importance of managing invasive species in agricultural landscapes is described under Action 10D Prevent & Eradicate Invasive Species
	Water use monitoring	I have tried to interest irrigators in monitoring devices to help quantify use in ways that would be beneficial for grant applications, and have had no success related to that. Most of the ditches are unmonitored as to the amount of water that enters the ditch, the amount each irrigator utilizes, the quality of the water that is returned/tails into the stream, and the amount of loss from the ditch.	Funding may be available through the OWRD cost share program listed under Action 9A Improve Water Use Measurement and Reporting.
	Invasive aquatic species	Irrigation structures that form shallow pools exacerbate high temperatures that can exceed the thermal threshold for aquatic species, benefiting invasive species such as small mouth bass and Parrot Feather.	Narrative has been added under "Invasive Species in Agriculture" on page 142 to reference irrigation infrastructure.
	Water rights and accommodations for habitat and recreational use	My region is predicted to get warmer and drier, but there is not method to reduce water rights that were allocated during far wetter times. The practice that require senior water right holders to utilize all of their allotment (meaning completely blocking stream flow in the height of summer) before junior water right holders can be regulated is counter productive to habitat and recreational use.	This challenge was also noted by many people during public engagement. The desire to change the prior appropriation system or keep it "as is" will continue to be a point of contention as we look for many additional ways to meet our collective water quantity needs (Actions 10A-10E, 12B-C).
34	Oregon Water Partnership	Oregon Water Partnership submits these comments to raise serious concerns with Draft 1 of the 2024 update of Oregon's Integrated Water Resources Strategy (IWRS)	
		Oregon Water Partnership (OWP) is a diverse partnership of statewide conservation groups with a common goal: to advocate for balanced water policies that ensure cold clean water to sustain healthy communities, livelihoods, and ecosystems. Our priorities are to build resilience for Oregon's water future, bring water data into the 21st century, support smart water management, and protect and restore our waters. We collectively have tens of thousands of members in Oregon communities across the state, and our organizations work collaboratively with cities, counties, Tribes, farmers, ranchers, and forest owners to restore habitat and improve watershed function.	
		OWP supports Oregon's efforts to manage our surface and groundwater resources in a coordinated, sustainable and equitable manner, protecting in-stream flows as well as senior water rights. Several of our member organizations have been involved with the IWRS since its inception, and all of our groups recognize the importance of the IWRS as a framework for understanding and meeting Oregon's instream and out-of-stream needs, addressing water quantity as well as water quality. While each of our organizations has its own priorities and perspectives, we are united in urging you to consider the following overarching comments in the forthcoming update of Oregon's Integrated Water Resources Strategy:	
	Restructure	Concerns with the wholesale restructuring of the IWRS: The IWRS was adopted in 2012 after three years of rigorous and inclusive public engagement, and was intended to serve as the guiding structure for decades into the future. Governing statutes call for periodic review and update, not a wholesale restructuring of the strategy. Despite this, the 2024 version wholly reworks the longstanding underpinnings of the strategy, including stripping statutory directives to understand and meet instream and out-of-stream needs from chapter titles, goal headings, and narratives; changing chapter titles to elevate some tools over others; removing the stand-alone section on climate change; and otherwise reorganizing and/or reframing the whole of the strategy a way that removes statutorily required balance.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.
	Public Engagement	Public Engagement Concerns. The 2024 update has been drafted without the guidance and input of a Policy Advisory Group (PAG)—a significant and detrimental deviation from the well-vetted process used to draft both the 2012 IWRS and the 2017 update. For a change of this magnitude—essentially a wholesale reorganization—the state should have undertaken rigorous and inclusive public outreach and engagement. Unlike previous IWRS update iterations, engagement efforts in 2023 offered no opportunity for the building of consensus recommendations. The product itself reflects the dis-integrated process; not only is this unlikely to lead to the consensus that the 2012 and 2017 revisions enjoyed but it could jeopardize the widespread stakeholder acceptance of this document and the strategy it embodies into the future.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.
	Framework	Framework Concerns. The one-page IWRS "Framework" document that synthesizes the IWRS is the go-to reference for legislators, agencies, decisionmakers, and the public. The Framework follows the structure of the IWRS, and in the past has provided a clear visual map for the work necessary to understand Oregon's instream and out-of-stream needs and the tools required to meet those needs. The Framework no longer stands alone as a logical and comprehensive summary of Oregon's water resource challenges and opportunities; a casualty of the wholesale restructuring of the underlying IWRS draft that further threatens its utility for decision makers and stakeholders alike.	Revisions are proposed to the framework for Draft 2 to clarify connection between chapters and objectives.
		OWP supports many of the new example actions that uplift ecosystem, data, and management needs. The addition of these new tools, however, does not mitigate our collective concerns related to the overall structural problems. Incorporating this feedback will honor the original intent of Oregon's IWRS statute and will help the Oregon Water Resources Department achieve its mission to "ensure the long-term sustainability of Oregon's ecosystems, economy, and quality of life."	Thank you for your comment.
35	Paul Riedmiller	Overall Please do not internally overhaul this policy without proper input or representation of Oregonians like myself. Unlike the 2012 and 2017 versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders. This siloed approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the IWRS. More work is needed. Thank you!	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.

36	Penelope Kaczmarek, Lincoln Co. Water Systems Alliance	Climate Change	It appears OWRD has removed the previous standalone subsection directing attention and action on climate change. This deletion threatens to replace good, solid work already completed. It weakens emphasis on climate change adaptation and resiliency as a priority for the state's water future. Please restore this subsection.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCCRI). Climate actions are now distributed among many actions to better integrate climate across the whole Strategy. The IWRS Project Team will look for a place to add narrative that retains emphasis on climate while continuing to integrate it across many actions.
		Funding for monitoring, regulation, enforcement	Significantly more funding for meaningful monitoring and regulation enforcement is past due. Friends at ODFW have reflected that there exist disturbing disconnects between generating data and obtaining critical findings and these having much if anything to do with informing timely improvements in regulation and enforcement.	Thank you for your comment. Funding for agency functions including monitoring, regulation, and enforcement is requested in Action 1B. Additional monitoring is called for in Action 7A and 9A. Additional agency field capacity is called for in Action 12F.
37	Rebecca Geisen, Portland Water Bureau	Overall	Page numbers may not match up as there were a couple of versions we looked at. Here are our	Detailed responses are provided for bullet items, below.
			<ul style="list-style-type: none"> • Support of climate change policies, funding and continued coordination with OCCRI 	
			<ul style="list-style-type: none"> • Ask them to include ODF and USFS as having a role in wildfire management – especially for watersheds that are part of a drinking water system 	
			<ul style="list-style-type: none"> • In regards to funding and affordability – integrate concepts throughout, also acknowledge that applying for funds can be a challenge 	
			<ul style="list-style-type: none"> • Need to update some outdated conservation resources – use what is already out there – update the WMCP manual to include guidance for benchmark reports and updates to WMCPs 	
			<ul style="list-style-type: none"> • Importance of regional partnerships – especially around public outreach, translations and engaging with CBOs 	
			<ul style="list-style-type: none"> • Highlight the work water providers are doing to support workforce development through apprenticeships and internships – they should be a partner 	
			<ul style="list-style-type: none"> • Need to acknowledge federal ownership of watersheds and land that supply drinking water (under coordination and collaboration) 	
			<ul style="list-style-type: none"> • Importance of adaptive planning (throughout the document) that acknowledges that future conditions are influenced by a range of interacting factors 	
			<ul style="list-style-type: none"> • Natural hazard mitigation strategies should include actions that ask the public to have an emergency supply of drinking water 	
			<ul style="list-style-type: none"> • Caution IWRS to not lump water conservation – acknowledge that many munis have robust water conservation programs that work for them and their customers – everyone's supply situation is different and some munis already have significant reduction in per capita use 	
			<ul style="list-style-type: none"> • Water reuse – highlight cost and practicality based on individual water system needs – any assessment should include cost benefit and management of water and wastewater systems 	
		Part 1	Current Water Challenges:	
		OCCRI	1. Continue to incorporate OCCRI in multiple strategies related to climate and center them as the key resource for climate information and climate services in the state.	Thank you for your comment.
		Continue integrating climate	2. continue to integrate climate resilience and mitigation throughout multiple strategies, as they are already doing, instead of separating it out into its separate category.	Thank you for your comment.
			3. advocate for financial resources that are needed to help local basins better understand climate impacts (see number 1) and conduct monitoring of existing water resources	Action 7D "Support Basin-scale Climate Change Research" supports this need. An example action has been added to 7D, "Advocate for financial resources to help local basins better understand climate impacts, including partnerships with OCCRI"
			Agency Roles: Pg. 18 The Oregon Dept. of Forestry has a role in wildfire management that should be acknowledged, particularly for watersheds that are critical for drinking water supplies. Pg. 21 Like ODF, the USFS plays a significant role in wildfire management that should be acknowledged, particularly for watersheds that are critical for drinking water supplies.	Revisions have been made on p 18 and 21 to acknowledge ODF and USFS role wildfire management, respectively.
		Part 2: Ch 1 Funding, address affordability	Funding: Funding actions in this section should explicitly mention the need for affordability, which has become and will continue to be, integral to Oregon's water challenges and future. Affordability should be integrated into the approach of the IWRS, particularly in Actions 1B and 1C. Though technical assistance for applying for the various loans and grants is mentioned, it is also worth highlighting the challenge that applications and the timing of funding pose for municipalities	A comment has been added to the draft to address affordability in example actions in 1B and 1C. A comment has been added for OWRD to follow-up about "timing" to better understand the challenge and potential solutions here.
		Part 2: Ch 2 Partnerships & Planning	Education and Outreach: Pg. 53: Select Education Resources OWRD's Water conservation resources are very outdated. While some good actions are identified, note that there are a lot of organizations who already have good info – don't reinvent the wheel.	A comment has been added to consider linking to other, more current, resources.
		Update WMCP guidebook	Specifically, the "Guidebook for Municipal WMCP" is woefully outdated and should be updated to include better guidance for updating a WMCP and preparing benchmark reports. This is specifically in OWRD's wheelhouse and a great role for the state to play to support muni-water right holders.	OWRD is beginning the process to update WMCP Guidebooks
Action 2A, regional partnerships	Action 2A – Highlight the importance of regional partnerships in educating the public about water resources (e.g. shared media market, sharing responsibility/contracts for translation of materials, collaborating with CBOs, etc.) Leverage information already out there and translated.	A comment has been added to Action 2A to consider how to fold in these types of partnerships.		
Action 2B	Action 2B – the Children's Clean Water Festival is highlighted as an example – perhaps the state could help fund/replicate similar efforts around the state (it is only available in the metro area).	Many resources available through the OSU Environmental Literacy Program website (Action 2B) are accessible to other parts of the state.		
Action 2C, Role of Water & WW Providers	Action 2C – It is important to highlight that water and wastewater providers have a role in workforce development and are doing some great work to bring people into the workforce. Some water providers have initiated internship and apprenticeship programs to help fill the void for water operators. The EPA grant is great, but very competitive – more state funding would be helpful to fund apprenticeship programs. Having only one Community College in the state with an operator certification program is really being felt by the industry in OR. An example action could be to partner with water/wastewater utilities to promote careers and provide on-the-job training.	A comment has been added to describe water and wastewater providers actions, apprenticeship programs, etc. The suggested example action has been added to Action 2C		
	Watershed Councils and OWEB are mentioned on p. 52, but this work could be elaborated on further in the Environmental Stewardship and Recreation section.	A comment has been added on page 52 to add items from OWEB and watershed councils		
Federal partnership in muni supply	Coordination and Collaboration: p. 62 –Federal ownership of watersheds/lands used to supply most of the municipal supply in Oregon should also be mentioned as an example of partnership. Additionally, entities like PWB have Habitat Conservation Plans that were developed in partnership with federal agencies to protect fish and other species.	A placeholder has been added to the draft to include a short discussion about partnerships between federal agencies (watershed ownership) and muni water supplies. This topic also ties to Action 11A "Ensure the Safety of Oregon's Drinking Water."		
Action 3C, EPA's definition "disadvantaged communities"	3C – OHA DWS should be included in lead or supporting agencies. The DWSRF fund currently uses EPA's definition of disadvantaged communities in its funding decisions, which only takes into account the MHI of an entire service area, rather than more specific populations/neighborhoods within that service area. This prevents large population centers like Portland from accessing DWSRF funds for some of its most underserved communities. OHA is aware of the issue but should be supported in seeking an alternative definition.	OHA has been added to supporting agencies on 3A. Challenges with DWSRF funding and disadvantage communities is more directly related to Action 11A. OHA is listed as a lead agency there. A new example action has been added to 11A "Seek alternative to EPA's definition of "disadvantaged communities" to increase eligibility for funding drinking water improvements in underserved communities in urban areas."		
Incorporate "Adaptive Planning" in several places	Water Planning: Water Planning should identify the opportunity to engage in Adaptive Planning – a developing discipline that acknowledges that future conditions are influenced by a range of interacting influences (climate, economic, social etc.) that do not behave in a linear and predictable fashion. Methods include identifying a range of possible future conditions and systematically monitoring to better match investments to changing conditions.	A comment has been added to consider introducing adaptive planning and incorporating in several places. It will be important to understand if any state agencies are currently using this terminology and approach.		
Action 4A	4A – Adaptive Planning could be added as a bullet in the example actions, such as: Support training for and implementation of adaptive planning principles and methodologies in master plans, place-based plans, and water management and conservation plans.	see above		

	Action 5A	Land Use Planning: Please see comment from Water Planning section. Adaptive Planning methodology also has applications to 5A, especially water master plans.	see above
	Action 6A	Natural Hazard and Mitigation: Natural Hazard Mitigation: Partners should also include county emergency managers – I guess that is under local governments, but it may be good to highlight – they are often missing from water-related conversations. An example action for all events (6A-C) should be to educate the public about the importance of having an emergency supply of drinking water.	"Local governments" listed under each as a partner would include counties. OEM publishes a list of all local (city/county) and tribal emergency managers. A link to this resource has been added to 6A-C action summary sheets. Suggested addition to example actions for Actions 6A-C have been made.
	Part 2: Ch 3 Data & Analysis	Water Resource/Supply Info: 7D - "Develop reliable projections of basin-scale hydrology..." - again, this is an opportunity to highlight Adaptive Planning, which acknowledges that future conditions are influenced by a range of interacting influences (climate, economic, social etc.) that do not behave in a linear and predictable fashion, rather than vague "reliable projections."	A comment has been added to consider introducing adaptive planning and incorporating in several places. It will be important to understand if any state agencies are currently using this terminology and approach.
		Adaptive Planning methodology also has applications to 7A, 7D, 8D and 9B, especially by forecasting a range of potential future conditions and by monitoring actual change to enable adjustments in strategy and project planning.	see above
		Instream and Ecosystem Water Needs: p.116 – Under Fisheries, would remove the word 'historically' from second sentence of the Fisheries paragraph to say "Northwest tribal communities, for example, rely on..." or add "have historically and continue to rely on..." to reflect the ongoing and modern interest of tribes in first foods.	Suggested edit has been made.
		8A – DOGAMI should be added to supporting agencies	Suggested edit has been made.
		8D – Adaptive Planning methodology has applications here – see comments in Water Resources/Supply Info section.	see above
	Part 2: Ch 4 Stewardship	Clean Water: p. 154 – Mention of the HB 2010 that directed the report on low-income assistance should note that the LPRO released its report and include a brief summary sentence or two of its recommendations.	A comment has been added to the draft to insert recommendations from the recently completed report.
	Action 12B, Water Conservation	Water Use and Management: Many municipalities have robust water conservation programs and resources for their communities. They also have different water supply situations. Whatever actions the state identifies should not interfere supersede what is working for local communities and their customers.	A comment has been added to the draft to expand discussion and better define what is needed at the state-level across various water sectors.
	Action 12C, Reuse	12C: While water reuse can be an effective way to stretch limited water supplies, water reuse projects need to be cost-effective and make sense, not be mandatory. Some areas of the state do not have constricted water supplies and/or already have very low per capita water use due to active and successful conservation. The cost of water is getting unaffordable so water reuse projects must make economic sense to the rate payer and the utility.	A comment has been added to the draft to add narrative regarding cost, practicality, and affordability
		A suggested language change: "Conduct a statewide assessment of the potential for additional water reuse, considering impacts, costs, benefits to water quantity and quality, and management of water and wastewater systems."	Suggested edit has been made.
		Water and Energy: p. 195 - Efficiency is only discussed at wastewater treatment plants but also occurs at water supply treatment plants and pump stations. There are energy efficiency opportunities at large pump stations and water utilities have an opportunity for efficiency improvements at water treatment facilities and pump stations at time of new construction and/or major updates. 14B - Energy Trust should be mentioned as a Program resource for municipal supplies.	The heading "Saving Water & Energy at WWTP" has been changed to "Saving Water & Energy at Municipal Utilities." Narrative has been added to include water supply treatment plants and pump stations. Energy Trust is a nonprofit organization, so rather than list under "Agency Programs" a link was added under "Documents/Websites."
	Are your water concerns addressed by Actions 1A-14B?	See comments.	
	Do you have other questions or concerns related to this feedback?	What is the process between now and the next draft? It would be helpful to have an option to be emailed a copy of your comments.	The next IWRS Draft release date is currently unknown. The IWRS Team will provide you with responses once next steps are known.
38	Rian vanden Hooff, Oregon DEQ, Water Program	DEQ would like to extend our deepest gratitude to WRD for the work, time, and energy poured into this document. It is full of incredibly valuable information – critical to protecting, conserving, and managing Oregon's water. The draft clearly represents a significant amount of effort and coordination, and generally provides an abundance of detail and critical information towards understanding water management in Oregon. DEQ has appreciated being a part of the strategy update and development thus far.	Thank you for your comment.
		For this review opportunity, we have attempted to engage a breadth of our water quality sub-program areas to ensure a range of perspectives within our agency have provided feedback and insight to, and evaluation of this draft. In generally, we believe that some aspects of reorganization and document slimming will ensure that the IWRS reaches its full potential for all readers and become truly digestible by all parties. Our suggestions have been captured and summarized into two sections, below: 1) overarching comments, including those regarding readability, formatting, and scope; and 2) detailed comments or editorial suggestions referencing specific passages or sections within the document. We make these recommendations but also recognize that resource and time constraints may challenge or limit the ability to address all issues raised.	Thank you for your comment.
		We hope that these comments and suggestions provide constructive feedback as WRD prepares a second draft for further review and public engagement in the coming months. DEQ looks forward to an ongoing partnership with WRD, other natural resource agencies, and the breadth of interested parties as we seek to establish an updated statewide water management strategy that will serve as a resource and decision-making guide for the next 8 years.	Thank you for your comment.
		Oregon DEQ Comments on Draft (V1) 2024 IWRS:	
	Action Prioritization	1) Overarching Comments • The current version of the 2024 IWRS struggles to present a feasible and implementable strategy. In addition to being an important reference document for water management programs and considerations, where possible, the IWRS should also strive toward presenting a vision for prioritized actions needed to secure a sustainable water future. If the "strategy" for solving Oregon's water issues it is to invest more in three categories of actions (e.g. partnerships and planning, data and analysis, and stewardship), then this needs further explanation and some prioritization of actions within those categories.	The IWRS has never historically prioritized actions. Recent efforts with the Governor's Office and state agency leadership are providing direction for prioritization and will be included in Draft 2.

Language, grammar, readability	<p>1.1) Language, Grammar, and Readability</p> <ul style="list-style-type: none"> •DEQ recommends that WRD performs a readability assessment of the current draft strategy. The strategy should be readable and digestible by a diverse range of audiences, including those with minimal background in water management and natural resource science or policy. Some of the current language may be too technical for a wide range of readers. •The strategy should use culturally appropriate terminology and consider a DEI lens when doing so. A thorough review to ensure that appropriate and consistent terminology referencing various interest groups may be needed. •The public and DEQ staff have noted the need for a more interactive version of the IWRS like a story map, or something more dynamic than a pdf document. DEQ encourages WRD to invest in constructing the IWRS with user-friendliness and accessibility in mind. This will ensure the frequent and sustained use by a broader audience. •The language in the document is largely passive. This is an actionable document – it should be strong and active in its language. <ul style="list-style-type: none"> oExample: Incentives are needed to encourage voluntary actions such as instream transfers or leases. This could be written as: Developing incentives will encourage voluntary actions such as instream transfers or leases. oConsider the use of an application, such as Grammarly, for the version editing to assist with passive 	Future document revisions will consider language, grammar, etc.
Action summaries	<p>The Action summaries often contain duplicate language from sections prior. This is repetitive and unnecessary.</p> <p>As indicated later in DEQ's comments, moving them to an appendix will help reduce redundancy and improve readability of the document.</p>	Draft 2 will move action summary sheets to an Appendix. Example actions from these sheets will need to be inserted into the narrative.
Document length	<p>While the strategy document has historically been a very dense and packed document with valuable and comprehensive information, it may be time to modernize the document and move it away from this structure. The current draft is very long and dense. Extensive background information and compound sentences may be burdensome for readers. In considering the digestibility of the draft, the spare images and graphics will be a turnoff for many readers. It is important to consider all learning types (Visual, Auditory, Read/Write, and Kinaesthetic).</p> <ul style="list-style-type: none"> o When introducing new concepts, it may be worth providing one-line or simple and quick definitions. Additional information can be moved to the appendix. Doing so will take a lot of the load off the reader - especially if they are familiar with these concepts. o Language is repetitive and clunky in places: <ul style="list-style-type: none"> •Example: "There is currently no authority for the Oregon Health Authority to enforce this requirement." – page 152 •Example: "...to improve resiliency, also providing an opportunity to improve fish passage (Action 10C), and improve water..." 	Given the original adoption timeline, much of the original language from Draft 1 was retained from the 2017 IWRS and updated by state agencies to reflect current initiatives. Draft 2 provides an opportunity to simplify language, while retaining intent.
Formatting, hyperlinks	<p>1.2) Formatting</p> <ul style="list-style-type: none"> •The document often provides external links to programs, acts, rules, and documents. This is a great tool to encourage further learning by readers and can help cut down on the detail necessary in each section. However, there are still many programs, acts, rules, and documents referenced in this draft that do contain links. If the hyperlinks of text start to become overwhelming/distracting for readability, it may be worth exploring whether links could be referenced via footnotes. oExample: Page 140, Chapter 4 there is a link to "designated as scenic waterways" but there is not a link to "Instream Water Rights Act". 	Formatting and addition of hyperlinks will be considered in future drafts.
Document Structure	<p>1.3) Document Structure</p> <ul style="list-style-type: none"> •The Draft is organized into two parts, Part 1: Oregon's Water Context, and Part 2: Strategy Actions. Strategy Actions then contains 4 chapters. It may be more structurally fluid to break the entire document into five chapters and eliminate the two parts. Chapter 1 would be Oregon's Water Context, and Chapter 3-5 would be the Strategy Actions. •We recommend changing the title of Chapter 4 to Stewardship and Management. This will better reflect the continued importance of water "stewardship" and reiterate the importance of water management. •The Action summary sheets that follow each Critical Issue section interrupt the flow of the document. Readers can often get "hung-up" on these rather than continuing through the document. It is recommended that the summary sheets either be moved to an appendix, or to the end of the chapter. In either of these locations, the summary sheets can act as a resource of further detail and from which work plans can start. 	The term "Management" was removed from the Chapter 4 title at the direction of the Water Resources Commission based on the rationale that "Stewardship" includes management. Several other reviewers noted the importance of using the term "management" at a chapter level. The Chapter 4 title will be returned to "Management & Stewardship" for Draft 2. Action summary sheets will be moved to an Appendix.
Framework, Context	<p>1.4) Context</p> <ul style="list-style-type: none"> •While climate change is no longer a stand-alone critical issue, it is incorporated into the Draft in numerous places. However, it may be beneficial to highlight Critical Issues or Actions related to climate change on the "IWRS Framework" page (page 210 in current draft). •The Draft could provide more emphasis around the need for help from the public and organizations to implement various aspects of the IWRS. The agencies alone cannot do all the work needed; it must become a public-private partnership to a greater extent. •The Water Governance background information that provides context about water related agencies and programs is very in-depth and detailed. It will be beneficial to either condense this section or move it to an appendix. The information here is very valuable but may detract from conveying the strategies need/sense for urgency or may overwhelm or discourage readers from continuing into the Critical Issues and Actions that come later in the document. 	Almost all of the actions have some relevance to climate adaptation, climate mitigation, or both. Draft 1 retains language from the 2017 IWRS that calls for public-private partnerships and increases awareness about non-state partners by listing "Partners" on each action summary sheet. Note that some public review comments call for voluntary actions to be removed from the Strategy indicating that they won't result in action. Detailed agency descriptions will be moved to an Appendix with a shorter summary provided within the narrative of the document.
Funding, grants vs. direct appropriations, address PBP	<p>1.5) Policy and Implementation</p> <ul style="list-style-type: none"> •It may be valuable to further explore and evaluate the ways with which water projects can receive funding. Projects may receive the best feedback and become the most successful when they are funded through a grants program with a strong technical review and evaluation process. In contrast to direct appropriations from the legislature increased attention and reliance to funding program processes could better ensure that funding is distributed to projects that have been vetted for readiness, worthiness of investment, and likelihood of achieving desired outcomes. •There are references in the draft strategy of Place Based Plans informing its development. It is not clear where or how this was done. A review of the approved Place-Based Plans may further inform the current draft of the IWRS. •Similar to the need for a centralized data platform, there may also be a need for a centralized funding platform. The number and complexity of various funding sources and programs may be difficult to track down or sift through for certain applicants. This would make for a possible example action under Action 1C. 	There are numerous grant programs listed throughout the IWRS that could support specific actions. The IWRS project team might discuss which specific programs would be appropriate for a "stronger technical review and evaluation process." Direct appropriations have been used to address urgent issues and will likely remain a tool as the state continues to catchup on deferred maintenance for many types of water infrastructure. Developing a centralized funding platform has been added as an example action under Action 1C.
Conclusion	<p>1.6) Conclusions and Actionability</p> <ul style="list-style-type: none"> •The Conclusions section lacks a strong vision and hope for where the Strategy is headed after its adoption by the Water Resources Commission. Does the State have a plan or preferred approach on how to coordinate and oversee implementation? How will the proposed work plans be completed and on what timescale? 	Statute now requires the development of an IWRS work plan every two years. The first interagency work plan will be developed in partnership with water core agencies. Tracking implementation will require new systems and practices.
	<p>The Conclusion section indicates that prioritization was not done for this 2024 edition of the IWRS (consistent with the previous editions), but that it could be done with the Governor's office and stakeholders as part of the legislative process. However, since lack of prioritization has been regarded as a weakness of previous editions and has complicated implementation of the IWRS, it may be optimal or preferable to pursue (or propose) a mechanism by which prioritization preferences could be captured from executive branch and various stakeholder perspectives.</p>	Following the release of Draft 1, the Governor's office and agency leadership came together to discuss prioritization. State action prioritization will be included in Draft 2.
Part 1	2) Specific Comments on Content	
pg 7	<p>Page 7: Consider starting with description of Part 1 – provides context...</p> <ul style="list-style-type: none"> o The broader phrase "degraded water quality" is better than "contaminated water" in first paragraph since it includes elevated temperature and low dissolved oxygen. 	Suggested edit was made.
pg 9	<p>Page 9: Current Water Challenges, the fourth sentence could elaborate somewhat on some challenges faced by those who do not turn on tap and enjoy clean water.</p> <ul style="list-style-type: none"> o The list of OKT report solutions, are they pulled directly from OKT report or were reworded slightly for clarity? Should note this or stick with OKT report language for accuracy/transparency. 	The bullet list of OKT solutions has in some cases been reworded for clarity.

pg 16	Page 16: ODEQ description, Comment: Should add municipal to the list of stormwater permits on page 35. And, on page 16 replace language in middle with "developing and issuing permits for wastewater treatment systems and industrial, construction, and municipal stormwater discharges that protect land, surface, and ground waters"... And replace last sentence with "ODEQ coordinates with other state and federal agencies on actions that may affect Oregon waters including partnering with other state agencies to support water quality programs and implement water-related regulations."	Suggested edit was made.
p 23	Page 23: The sentence should read – "Oregon Department of Agriculture is the lead agency responsible for assigning WPCF and NPDES permits..." (as DEQ actually issues them)	Suggested edit was made.
	Page 26: The 1987 Instream Water Rights Act description should include all three ways to create instream rights including by changing character of use of existing rights to instream use through transfers, leases, and allocation of conserved water, and, importantly, that the seniority date stays the same as the original right. (This is important because water transactions will become an ever-increasing tool for how we move water from where and how it is used now, to meet new uses and demands, for instream benefits and other beneficial uses). In the Draft, the success and promise of voluntary environmental water transactions is understated. Also, all acceptable reasons for protecting instream flows should be listed or include pollution abatement in the short list please.	Description of ISWR has been made to include OAR for pollution abatement.
p 27	Page 27: Conservation, the formula is always confusing to people even when explained. Easier to just say at least 25% instream and possibly more depending upon the amount of public funding or other agreements.	Suggested edit was made.
Part 2, p 36	Page 36: Should the IWRS guiding principles have been introduced sooner in the document, such as in the Introduction?	Part 1 outlines the roles, responsibilities, and legal framework of water in OR. Part 2 starts with the IWRS guiding principles because these apply to the Strategy, and logically make sense to directly precede the Strategy actions.
Chapter 1	Page 41: Currently there may be adequate incentives for dedicating water instream, the gap may be organizational capacity to develop and negotiate the voluntary agreements. Currently Trout Unlimited and Deschutes River Conservancy are the only non-profit conservation organizations actively developing projects.	Thank you for your comment.
CWSRF	Page 43: The Clean Water State Revolving Fund is currently (2024) offering forgivable loans up to \$100,000 with BIL funds for feasibility studies and planning documents of many kinds.	Text has been added. If funds are available beyond 2024, please note.
	Action 1A: could include example action of Fund biennial progress reporting.	Suggested edit was made.
Chapter 2	Chapter 2 (and Chapter 4): The draft should mention the work planned on the Stewardship and Supply Initiative being led by WRD. No mention was noted in the draft document.	A placeholder has been added to Chapter 2. A report is due to the Legislature on or before October 1, 2024. Narrative will be added for Draft 2.
Water System Training Center	Page 56: What will the Water System Training Center do and where will it be located? It sounds like some added details would be helpful here, if known.	Details are unknown at this time. A comment has been added to Draft 2.
Water Planning	Page 69: The introduction to the critical issue Water Planning does not adequately capture the reason or importance of good planning to ensure follow-on investments are focused on the actions and sequenced to achieve efficient progress, and other considerations.	The introductory paragraph has been edited.
Basin studies	Page 72: The transition to state basin studies seems confusing. Somehow make this more distinct from place-based planning which also happens at the regional level.	A comment has been added to improve this transition.
LID & GI	Page 81: LID and Green Infrastructure: second paragraph last sentence, reducing downstream impacts to receiving streams...please add ...'which also reduces stormwater infrastructure maintenance'.	Suggested edit was made.
Drought	Page 84, last paragraph: These conditions can lead to....please add 'drinking water beneficial uses' to that list.	Suggested edit was made.
Chapter 3	Page 115: How is lithium related to the heading "Water Instream Supports Economic Health"? Lithium mining seems out of place here.	Lithium mining can negatively affect SW quality (as well as reduce gw quantity). Lithium discussion will be reviewed for inclusion in Draft 2.
Monitoring ISWR	Page 117: It should be clarified whether instream rights are monitored in addition to the 250 with stream gages.	Added a placeholder to update this information.
Action 8D	Action 8D: This Action seems brief and not fully developed. Consider revisiting this to provide greater detail.	This is one of two new actions and will be further developed.
	Page 123: Out of Stream Water Needs, is this too broad of a critical issue? It covers so many needs and so much use in Oregon.	This critical issue (in 2017 "Further Define Out-of-Stream Needs/Demands") was carried over from 2017 and shortened to exclude a verb to match all of the other critical issues. Its 2024 location in the Data & Analysis chapter indicates these should be data and analysis actions to understand our out-of-stream water needs.
Chapter 4	Page 140: State Scenic Waterways are administered by the Oregon Parks and Recreation Department –this is valuable context as we are linking agencies to actions etc.	They are identified in Part 1 under initial description of the program. Reference has been added on page 140.
GW Allocation Rulemaking	Page 143: Groundwater management rulemaking underway. This rulemaking should be referred to as Groundwater Allocation Rulemaking	Heading discusses 2 rulemakings, only 1 of them is a gw allocation rulemaking.
Action 10D	Action 10D: Additional example action – Promote the growth, propagation, and sale of native plants. o This action can easily be assigned to ODA or OSU Extension and be used in following/well abandonment projects, restoration projects (post-fire or restoration), etc.	Example action has been added.
Drinking water emergencies	Page 153: E.coli outbreaks at drinking water sources might be a good example to include in the drinking water emergencies list.	Example has been added to the narrative.
PSP	Page 154: Move Pesticide Stewardship Program to after the Toxics Reduction Strategy because it will naturally transition better due to the mention of the PSP in the last sentence of the section.	This comment doesn't reflect the narrative in Draft 1 (could it be from an earlier version?). The PSP program is described after the Toxics Reduction Strategy.
PSP	Page 155 (PSP): The PSP program is co-led by ODA and DEQ. o PSP, last sentence before goals: It is best if this sentence is removed, as it does not provide much value. "Many pesticide users support the PSP Program because it allows for voluntary pesticide management changes prior to the possibility of regulatory action by the Department of Environmental Quality." o PSP, final sentence of section: There is no purpose for referencing nonpoint pollution here, it is unnecessary.	The suggested deletion about pesticide users supporting the program has been made. The sentence about nonpoint pollution has been kept to help readers link pesticides and nonpoint pollution.
Action 11A	Action 11A: Assist drinking water systems of all sizes; increase technical, administrative, and funding resources for small and very small water systems (less than 15 connections) o What about sources that serve less than 25 people?	Oregon very small systems are more specifically defined as serving 4 to 14 connections and used by 10 to 24 people more than 60 days per year.
Storage Reservations	Page 171, Evaluating Reservations for Storage: Reserved water is to be used specifically for future economic development uses within agriculture and was created by ODA. This section lacks detail/context about the program. Review OAR-690-079 or specific basins under basin rules (OAR 690-500) for the basins listed. Here is a useful reference.	Storage reservations were created as part of the instream water rights act. Additional text has been added in Part 1 to introduce this and at the beginning of the paragraph on page 171. A comment has been added on page 171 to expand upon the program.
Action 12D	Action 12D: Improve access to storage sounds like developing more above ground storage projects. Would it be applicable to change the title to "Improve Access to Storage Alternatives"? o Restoration activities and flood plain connectivity projects should also be listed here because they can help store water in the system due to slowing flows. ▪The above action can also be applicable to Action 13A.	The IWRS team removed the term "built" from the original action to better reflect that AR & ASR are included in this action, carried forward from the 2017 IWRS. Restoration/floodplain projects are mentioned in 6B, 10A, and 13A.

		Action 12G	Action 12G: Link this action to the need for water data, such as supporting the development of the Oregon Water Data Portal to ensure applicants and agencies have access to accurate, quality data on which to design projects or base permitting decisions. Such as: o "Create stronger linkages among partner agencies"..... specifically during the permitting process o "Create and modernize for more efficient and user-friendly permitting processes" continue to update ad modernize online/virtual aces to permits and permit records	Text has been added to the second intro paragraph. Also added example action to support OR Water Data Portal for permitting.
39	Rick & Lindsey Noss	Overall	As a responsible home owner who has been worried about the fast declining of our water supply and ongoing fight to protect our water supply from irresponsible misuse of this precious resource: we do NOT support the decision by OWRD to completely overhaul/restructure the IWRS which effectively disregards the positive & collaborative historical work to these policies since 2012 & updated 2017. Don't fix what is NOT broken. OWRD should start over by convening a policy advisory group (PAG) that is inclusive. The PAG should update the strategy following the authorizing legislation and, as in prior iterations of the IWRS, with considerable input from a wide variety of stakeholders and interests.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document in its current form. State agencies have a responsibility to implement the IWRS and were not finding utility in the current structure. Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.
		Part 1	see general comments provided. Work with Oregon Water Watch, policy advisory groups made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders for sound policies.	Thank you for your comment.
		Part 2: Ch 1 Funding	see general comments provided. Work with Oregon Water Watch, policy advisory groups made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders for sound policies.	Thank you for your comment.
		Part 2: Ch 2 Partnerships & Planning	see general comments provided. Work with Oregon Water Watch, policy advisory groups made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders for sound policies.	Thank you for your comment.
		Part 2: Ch 3 Data & Analysis	see general comments provided. Work with Oregon Water Watch, policy advisory groups made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders for sound policies.	Thank you for your comment.
		Part 2: Ch 4 Stewardship	see general comments provided. Work with Oregon Water Watch, policy advisory groups made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders for sound policies.	Thank you for your comment.
		Are your water concerns addressed by Actions 1A-14B?	see general comments provided. Work with Oregon Water Watch, policy advisory groups made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders for sound policies.	Thank you for your comment.
40	Robert Bernstein	Overall	I have basically agree w all of Waterwatch of Oregon's recommendations..after we finally got bold enough as a State to do something meaningful..this should not be undermined, public has NOT been informed about this. ...:	
		Ecosystem additions	Support ecosystem additions: Support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.	Thank you for your comment.
		Increased funding	Support increased funding of state agencies to do water work: Full implementation of the strategy is dependent on robust funding of state agencies, as well as state agency coordination on water work. To be clear the 2024 version does put more attention on this, and deserves support.	Thank you for your comment.
		Elevate water management	Elevate water management: OWRD must focus greater attention on water management. Rigorous, smart water management — including enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future — should be front and center of any state water strategy. The 2024 version elevates attention on voluntary planning and partnerships (making it one chapter of four), but does not grant improved, smart water management the same gravitas or urgency.	Action 1B calls for funding to support agencies responsible for water management. Water management, including regulation, enforcement, and changes to policies are all included in Ch 4 "Stewardship", as water management is one way we take care of our water. The word "management" was originally included in the Ch 4 title ("Management & Stewardship"), but the Water Resources Commission suggested we remove it with the rationale that "Stewardship" encapsulates management. The IWRS project team proposes to reinstate the word "Management" into the Chapter 4 title for Draft 2 of the 2024 IWRS.
		Climate Change	Ensure climate change is front and center: The 2024 IWRS proposes to remove the stand alone subsection on climate change found in the 2017 version. While additional "example actions" have been included in the 2024 IWRS related to climate, which we support, the OWRD has removed the previous standalone subsection directing attention and action on climate change. This reorganization sends Oregon backwards and signals that climate change adaptation and resiliency is not a priority for the state's water future.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCRI). Climate actions are now distributed among many actions to better integrate climate across the whole Strategy. The IWRS Project Team will look for a place to add narrative that retains emphasis on climate while integrating it across many actions.
		Restructure	Don't fix what isn't broken: We oppose the wholesale restructuring of the IWRS. This change in direction was an internal decision that did not arise out of the minimal public engagement efforts the OWRD undertook on the update of the strategy. The 2012 IWRS was developed after years of robust and transparent public engagement, with the intent being it would serve as the cornerstone framework for future iterations. The siloed decision to rework the whole document undercuts years of work that resulted in a clear and cohesive document that addressed both instream and out-of-stream needs in a balanced manner directed by governing laws.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.
		Balance	Bring back balance: The new iteration removes, relocates, or rewords key directives meant to ensure balanced attention to instream and out-of-stream needs. This could dilute agency and legislative attention to instream needs. The OWRD must reinstate balance into the framework.	Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely.
		Further engagement	Further engagement is required: Unlike the 2012 and 2017 versions of the IWRS that were developed after years of vigorous public engagement and actual consensus hammered out after many meetings, the OWRD forged ahead with a wholesale restructuring of the 2024 version without the benefit of discussion or consensus within a policy advisory group made up of tribes, conservation groups, agricultural interests, municipal representatives, the governor's office, state and federal agencies and other stakeholders. This siloed approach is not aligned with the OWRD's general approach to transparent public engagement, and it is inconsistent with past public engagement on the IWRS. More work is needed.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.
		Policy advisory group	OWRD should start over by convening a policy advisory group (PAG) that is inclusive. The PAG should update the strategy following the authorizing legislation and, as in prior iterations of the IWRS, with considerable input from a wide variety of stakeholders and interests.	see above
		Do you have other questions or concerns related to this feedback?	My concern is a lack of public awareness and lack of outreach, inclusivity..	Consider signing up for OWRD's Govdelivery emails, choosing "IWRS" as a topic.
41	Robert Davidson	Overall	The Kalamath River dam removal was a disaster, the Rogue River dam removal a disaster. I can't support you any longer.	Thank you for your comment.
		Part 1	miss guided	Thank you for your comment.

		Are your water concerns addressed by Actions 1A-14B?	Stop supporting dam removal.	The IWRS presents a balance of needs. In some cases, dams are unsafe and repairing them is too costly, or they are no longer serving their intended purpose. The IWRS recognizes the need for new storage as well, Action 12D "Improve Access to Storage."
42	Stan Dean, Oregon Association of Conservation Districts	Interagency Scope	Overall, Draft 1 of the IWRS provides a comprehensive description of the issues and approaches that are necessary to manage our water resources. We appreciate that the scope of the document is not just limited to the mission of OWRD and really does cover the work done by all the key natural resource agencies in Oregon.	
		Costs to Implement	Information on costs to implement the IWRS is substantially deficient. We recognize that it would be difficult to cost load all the actions in the IWRS, but we feel it is important to make an attempt to estimate what it will take to pay for the water future that we desire. We had hoped that the "Business Case for Investing in Water in Oregon," published in July 2023, would provide more robust information on what a good statewide level of investment would be, but it did not do this. It largely provided cost information on a few examples of actions that are important in certain regions of the State.	Estimating costs for each action would be very difficult and is beyond the scope of the IWRS.
		Costs to Implement	The draft IWRS mentions the upticks in funding through the last two legislative sessions, and applauds the increases, but we are still left wondering whether these upticks are sufficient. How much more do we really need in the coming decades?	Estimating costs for each action would be very difficult and is beyond the scope of the IWRS.
		Costs to Implement	In the conclusion of the Draft IWRS there is a short section titled "Remaining Resource Gaps." The information in this section seems to woefully underrepresent the funding challenge we face. First of all, there are no dollars attached to each of the identified gaps. Second, we believe that there are many more actions that need additional funding. For example, no gaps in funding were identified for the critical issues of education and outreach, coordination and collaboration, and water planning. Does this mean that current funding levels for these issues are sufficient to carry us into the future? Another example is in Chapter 3, where funding gaps are not identified for two critical issues, instream and ecosystem water needs and out of stream water needs. Again, are we saying that we can do all the work that is needed on these critical issues within the existing budgets? In chapter 4 there appears to be several very important high-cost actions that are not identified to have funding gaps. Some of these are action12C (Encourage Water Reuse Projects), action 12D (Improve Access to Storage), action 13A (Maintain, Upgrade, and Decommission Water and Wastewater Infrastructure) action 13B (Encourage Regional (Sub-Basin) Approaches to Water and Wastewater Systems), action 13C (Support Dam and Levee Safety) action 14A (Use Existing Infrastructure to Develop Non-Traditional Hydroelectric Power) and action (14B Promote Strategies that Increase/Integrate Energy and Water Savings.)	An assessment of actions with funding gaps will continue as we refine the Strategy and better understand the timeframe for IWRS future drafts and potential adoption timeline.
		Costs to Implement	We might hope that we can get closer to the answer of "how much funding we need going forward" in the forthcoming progress reports to the legislature. However, we do not expect that the legislature will ever be able to answer this question on their own and the answer should be provided in the IWRS, even if it needs to be a wide-ranging estimate.	The new requirement to produce a biennial work plan may be a first step in this process. This could help identify the agency staff and program needs, and budgets associated with these. Estimating costs needed for infrastructure will be complex.
		Climate Mitigation	Climate mitigation is largely missing in the IWRS. We appreciate that our changing climate and its effects on our water environment are recognized throughout the IWRS. This discussion is largely framed in the context of what we need to do to adapt to the changes. Chapter 2, provides good discussion on climate adaptation. Also, action 7D which focuses on climate research is positive. There is also a brief mention of Oregon's goals for greenhouse gas levels and the work of the Climate Action Commission and the Natural and Working Lands Proposal under action 7D. Action 8A mentions the need for energy from hydropower as clean energy.	Ways to address climate mitigation (including several recent state reports and action plans) throughout the document requires further attention. During IWRS Draft development, the DEQ Climate Protection Program was challenged/paused. This program is undergoing rulemaking in 2024 and would be a good resource for significant state direction on mitigation targets.
			Despite all the discussion mentioned above, little is mentioned about climate mitigation,	
			i.e. actions that result in less greenhouse gas emissions. A key aspect of climate mitigation for the water world is implementing technologies that use less energy as this directly correlates to less greenhouse gas emissions. Good examples of how this can best be accomplished are energy efficient pumping and irrigation systems and water conservation. Another good example is use of natural systems to sequester carbon. The IWRS does a good job of noting the importance of natural systems in retaining and cleaning water, but there is no mention of their benefits in terms of carbon capture.	A note has been added for the IWRS project team to discuss how/where to address, and possibly address in more detail in the "Water & Energy" section in Chapter 4.
		Prioritization	Guidance on setting priorities is needed. On page 6 it is stated that "actions are not given a prioritization. However, this can be addressed in partnership with the Governor's Office and interested parties as part of the Legislative process." While it will be necessary for the governor and legislators to be involved, this is not enough because this approach has often resulted in underfunding and is likely to lead to the same situation in the future. The IWRS should attempt to highlight some of the most important and underfunded actions that need attention immediately. Perhaps this problem can be partially addressed in the forthcoming biennial work plans, but it should not be ignored in the IWRS.	Agency leadership will be providing additional direction on a potential change in approach for the IWRS, to address prioritization, timelines, and metrics.
			OTHER COMMENTS	
		Education Program, Ch 2, Action 2B	Action 2B pertains to K-12 education. A good and important program, Oregon Envirothon is missing and should be acknowledged. This is a program in which high school students learn about environmental science and then teams compete to demonstrate their knowledge. Competitions are held regionally, and winners advance to the State level, and the best go on to compete nationally.	Mention of "Oregon Envirothon" has been added to Action 2B narrative
		SWCD Funding	The role of Soil and Water Conservation Districts in helping to achieve our desired water future is mentioned at various points throughout the document. We greatly appreciate the acknowledgement of how we help, but we would be remiss to not point out that funding is also necessary to support continued and expanded work to meet the goals.	Narrative has been added to Action 1B regarding how state agencies support local entities. Specifically described ODA funding SWCDs, OWEB funding WC's.
		Supports Restructure	OACD submitted our main comments in a separate letter on this same date. However, we want to add our support for the new format of the IWRS. We believe that the new format is conducive to presenting a wholistic view of the actions that must be taken in the future and at the same time capturing detail on specific topics.	Thank you for your comment.
43	Susan Smith		I have the following comments:	
		Process	Most importantly, having recently served on the groundwater allocation RAC, I believe process is important. OWRD developed the 2024 IWRS without the benefit of an advisory group with tribes, conservation groups, agricultural interests, municipalities, political leaders, state and federal agencies, and other stakeholders. The Department doing independent consultations with various groups is not the same as sitting around a table and working together on a wicked and crucial problem. The process was inconsistent with the OWRD's generally outstanding approach to transparent public engagement and with the prior approach used to formulate the IWRS. OWRD needs a do-over.	Previous versions utilized a Policy Advisory Group (PAG) in addition to public engagement. We heard from people that they did not like the PAG process and found it exclusionary. The 2024 had enhanced outreach for greater public engagement to reach people that had previously not been involved. Outreach and engagement will continue as the IWRS is further developed.
		Climate Change	Second, climate change is the issue. The 2024 IWRS mistakenly obscures it by removing the climate change section in the 2017 version. The inclusion of "example actions" in the 2024 IWRS related to climate is great, but needs to be prefaced by a section directing attention to and action on climate change. It is essential that the 2024 IWRS explicitly discuss the impact of climate change on water and make climate change adaptation and resiliency the top priority for the state's water future.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCRI). Climate change is a critical component to the IWRS and adaptation/ resiliency strategies are incorporated throughout. The IWRS project team will consider ways to improve attention on climate change.
		Voluntary v Reg/Enforcement, Prior Appropriation	Third, drop the Pablum: voluntary planning and partnerships are great. But Oregon cannot primarily rely on volunteerism with the one public resource more valuable than gold. We need to do intelligent thoughtful management of this most precious resource -- backing our decisions with good data, rigorous regulation, and real enforcement. If statutory changes are necessary to make this happen, propose them. Despite our reluctance to move away from 19th century water management, we have and should tweak prior appropriation doctrine to assure it serves us well in the reality of the 21st century. Water must be protected with a strong, well-designed regulatory system, not thoughts and prayers.	Strategy support for enforcement, regulation, and water rights modernization can be found in Actions 1B, 12F, and 12G. All planning actions from the 2017 IWRS have been carried forward to the 2024 draft. Only one new planning action has been added, 3C "Lead Meaningful Community Engagement." Planning with communities (rather than for them) helps to avoid environmental justice impacts and provides the forum for relationship building needed to navigate climate change.

		Ecosystem Protection & Emphasis for Funding	Finally, I strongly approve of the emphasis given to ecosystem protection and endorse the need for adequate funding. Please ignore any pushback you get on these matters. Let's prevent destruction of, and prioritize restoration of, ecosystems so that we don't need to spend billions upon billions of dollars in what may ultimately be vain attempts to save endangered fish.	Thank you for your comment.
44	Susan Murbach	Water quality, aerial herbicides, forest mgmt	I do not know about the document but am concerned for water quality in Lincoln County and other Oregon counties as 2-4-D mixed with other chemicals are being sprayed near streams by helicopter in our area for the last 40+ years. We need a new shift in our forest management practices that create better ecosystems and water management strategies along with regenerative harvests that help biodiversity in our local forests.	The need for improvement to forest management practices resulted in new legislation that will modify the Forest Practices Act. This should result in larger buffers around riparian areas and other actions to reduce water quality impacts. This is described in Part 1, page 29. Actions 11A-11C to protect water quality are also discussed under "Clean Water" starting on page 150.
		Part 2: Ch 1 Funding	This is a resource life needs to survive. I am happy to pay taxes to secure a future with abundant clean water.	Thank you for your comment
		Part 2: Ch 2 Partnerships & Planning	All the more people involved in water use and planning the better. We need clean water for all life.	Thank you for your comment
		Part 2: Ch 3 Data & Analysis	Please test our waters and create safe habitats.	Thank you for your comment
		Part 2: Ch 4 Stewardship	We all need to realize the importance of water stewardship.	Thank you for your comment
		Are your water concerns addressed by Actions 1A-14B?	In stream needs need to be met for all species relying on cold clean water. Please do not let agriculture needs take the life out of our streams. Leave water for fish.	Thank you for your comment
		Do you have other questions or concerns related to this feedback?	Thank you for caring and communicating with local people	Thank you for your comment
45	Suzanne Fouty	Funding for state agencies	I am a retired USDA Forest Service hydrologist and have spent much of my career in eastern Oregon where water quality and water availability are major concerns for human and wild communities. I have experienced firsthand the challenges that come when agencies are underfunded and lack the needed staff to address complex issues and respond to changes. To successfully implement this strategy requires that all state agencies addressing water issues be well-funded and work together to maximize efficiencies and effectiveness.	Thank you for your comment.
		Climate change	I urge you to retain the stand-alone subsection on climate change found in the 2017 version. With climate changes accelerating and impacts on communities increasing, climate change must continue to be a focal point of this important water-driven strategy. Keeping it as a stand-alone section will help OWRD keep climate change and improving system resiliency as a major priority. We cannot afford to lose ground on this issue.	In the 2012 and 2017 IWRS, the standalone climate section focused on describing projections that are now frequently produced as Climate Assessments by the Oregon Climate Research Institute (OCRI). The standalone Climate Change actions were re-distributed across all of the other actions (better integrating them). The IWRS project team will consider ways to improve attention on climate change.
		New initiatives needed	New initiatives need to be added to document that advance instream, ecosystem, water quality, climate change and equity. These issues are interrelated and each enhances the success of the others. Their inclusion makes sure that this plan is properly focused on the future given the challenges before us.	The current approach has been to add climate change and equity "example actions" for most Strategy actions, shown on the action summary sheets. Future action prioritization by leadership may lead to additional initiatives that advance instream/ecosystem/water quality.
		Exclude voluntary plans or actions	The strategy must undertake a smart, enforceable water management strategy that is rigorous given that water is an essential resource and demands on stream and groundwater systems are increasing. This include enforcement, regulation and the modernization of laws and policies to ensure a sustainable water future. Voluntary planning should not be part of this strategy. Requests for voluntary plans or actions rarely produce anything.	Strategy support for enforcement, regulation, and water rights modernization can be found in Actions 1B, 12F, and 12G. All planning actions from the 2017 IWRS have been carried forward to the 2024 draft. Only one new planning action has been added, 3C "Lead Meaningful Community Engagement." Planning with communities (rather than for them) helps to avoid environmental justice impacts and provides the forum for relationship building needed to navigate climate change.
		Instream needs	Instream flow needs must be given equal weight to out-of-stream needs. Ignoring instream flows or treating them as secondary importance fails to keep intact a vital component of healthy ecosystems – essential to all communities. As has too occurred, instream flows are sacrificed leaving some communities severely impacted for the benefits of others or industry. The strategy must prevent this	Public engagement showed strong support for instream needs. Several steps were taken to improve recognition of instream needs. 1. Discuss instream data needs first, before out-of-stream needs (Ch 3). 2. Add a new action calling for instream demand forecasts 3. Begin the Stewardship chapter (Ch 4) with Ecosystem actions to underscore the foundation on which we rely.
		Restructure	The OWRD decision to restructure the strategy without public involvement in such a vital resource compromises trust in the agency. It suggests that there are forces at work which seek to diminish the challenges we face so that others can benefit. I urge you to keep what has worked and reengage with the public in areas that merit major changes.	As outlined in the January 2023 Secretary of State Report 2023-04, the 2017 IWRS is not adequately functioning as a strategic document. Improvements needed to address funding, equity, and climate change resulted in changes to the document structure for the 2024 Draft. Much of the original narrative associated with each action (carried forward from 2017) remains and has been updated, where needed, to reflect current issues and input from 15+ agencies. Input from agencies was necessary to update agency program-specific narrative, increase agency participation in implementation, and develop the Action summary sheets, as we aim to make the Strategy more actionable. The 2024 Draft IWRS retains the goals, objectives, and guiding principles of the 2012 & 2017 IWRS.
		Further engagement	In summary, ODWR's recent approach to updating the IWRS without active public input is troubling. Before approving, the department leadership needs to take a step back and engage with the wide variety of stakeholders who will be impacted by this document. We need a quality document that will help us all navigate an increasingly difficult future with as much success as possible.	The IWRS Team will be carrying out additional engagement in the fall of 2024.