

<b>Name</b>	<b>Organization</b>	<b>Location</b>
Cliff Mitchell		Bend, OR Deschutes County
Dean Runyan	Board member, Waterwatch of Oregon	Portland, Multnomah
Don Coats		Prineville Crook Co.
Edward Wolfe		Newport OR
Evan Neyland		Bend, Deschutes County
Genny Bond		Dallas, Polk County
Gloria and Bob Ziller		O'Brien, Josephine
Jean Edwards		Hillsboro Washington County
Jeffry Gottfried		Portland
John DeVoe		Multnomah
Kathleen Samsel		Seaside, Clatsop
Laurel Hines		Salem, Marion County
Leslie Bach	Retired Hydrologist	Portland, Multnomah
Mark Scantlebury		Portland, Multnomah County
Mary Lou Soscia		Portland, Multnomah
Merry Ann Moore		Portland, Multnomah
Nancy Nichols		Deadwood, Lane
Nathan Gehres	Applegate Partnership and Watershed Council	Ruch, Jackson County
Paul Riedmiller		Portland, Multnomah
Penelope Kaczmarek	Lincoln Co. Water Systems Alliance	Siletz Oregon
Rebecca Geisen	Portland Water Bureau	Portland, Multnomah
Rick & Lindsey Noss		Newberg, Yamhill
Robert Bernstein		Portland, Multnomah
Robert Davidson		Gold Hill
Susan Murbach		Waldport, Lincoln County

**2024 Draft 1 Integrated Water Resources Strategy (IWRS)**

**Public Review Comments Received Through Online Survey**

March 5-April 5, 2024

<b>Comments From</b>	<b>Location</b>	<b>IWRS Topic/Location</b>	<b>Comment</b>
Cliff Mitchell	Bend, OR Deschutes County	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.
Dean Runyan	Portland, Multnomah	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.
		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.
		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.
		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.
		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."
		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.
			Finally, the entire document should be subject to a thorough review by a panel of experts and interested parties.
Don Coats	Prineville Crook Co.	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.
Edward Wolfe	Newport OR	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.
		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.
		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.

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Evan Neyland (also submitted email)	Bend, Deschutes County	Overall	<p>Support for ecosystem additions. I strongly support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.</p> <p>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.</p> <p>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.</p> <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 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.</p>
		Restructure, balance, further engagement	<p>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.</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. 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.</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 engagement is needed.</p>
Genny Bond	Dallas, Polk County	Groundwater & rural development	<p>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.</p>
		Groundwater & rural development	<p>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.</p>
Gloria and Bob Ziller	O’Brien, Josephine	Overall	<p>Support ecosystem additions: Support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.</p> <p>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.</p> <p>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.</p>

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			<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>
Jean Edwards	Hillsboro Washington County	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
Jeffry Gottfried	Portland	Groundwater Allocation	<p>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.</p> <p>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.</p>
John DeVoe	Multnomah	Overall	<p>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.</p> <p>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.</p> <p>For rivers, John DeVoe</p>
		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.
		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.
Kathleen Samsel	Seaside, Clatsop	Overall, and Report on Progress	<p>Well planned.</p> <p>I would like to see dates where the progress is reported to each county and the state in general.</p>
		Are your water concerns addressed by Actions 1A-14B?	yes except for the reporting and possible allowance when a change is needed.

Comments From	Location	IWRS Topic/Location	Comment
Laurel Hines	Salem, Marion County	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).
Leslie Bach	Portland, Multnomah	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.
		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.
		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.
		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.
		Part 2: Ch 4 Stewardship	No comments
		Do you have other questions or concerns related to this feedback?	Not at this time.

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Mark Scantlebury	Portland, Multnomah County	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>
			<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"> <li>• Support ecosystem additions with new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.</li> <li>• Support increased funding of state agencies to do water work.</li> <li>• Elevate water management and not rely on voluntary planning and partnerships.</li> <li>• Ensure climate change is front and center.</li> <li>• Not fix what isn't broken by attempting a wholesale restructuring of the IWRS.</li> <li>• Bring back balance by not removing, relocating, or rewording key directives meant to ensure balanced attention to instream and out-of-stream needs.</li> </ul> <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>
Mary Lou Soscia	Portland, Multnomah	Overall	<ol style="list-style-type: none"> <li>1. Support ecosystem additions: Support the addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>
			<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>
			<ol style="list-style-type: none"> <li>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.</li> </ol>

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Merry Ann Moore	Portland, Multnomah	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"> <li>*The addition of new actions that advance instream, ecosystem, water quality, climate change and equity initiatives.</li> <li>*Increased funding of state agencies to do water work. Please make sure this funding is sufficiently robust.</li> <li>*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.</li> <li>*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.</li> <li>*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.</li> <li>*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.</li> </ul>
		Do you have other questions or concerns related to this feedback?	See initial comments
Nancy Nichols	Deadwood, Lane	Part 2: Ch 1 Funding	I am concerned that funding for Watermasters is no enough to monitor and stop illegal appropriations of water.
Nathan Gehres, Applegate Partnership and Watershed Council	Ruch, Jackson County	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.
		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.
		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.
		Groundwater	Groundwater in the region is very fragmented, and assessing what is available would be difficult to impossible to quantify with current technology.
		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?
		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.
		Irrigation ditches and invasive species	Also, irrigation ditches are excellent vectors for invasive species, planning methods to mitigate that hazard would be good.
		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.
		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.
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.		
Paul Riedmiller	Portland, Multnomah	Overall	<p>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.</p> <p>Thank you!</p>

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Penelope Kaczmarek, Lincoln Co. Water Systems Alliance	Siletz Oregon	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. <b>Please restore this subsection.</b>
		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.
Rebecca Geisen, Portland Water Bureau	Portland, Multnomah	Overall	Page numbers may not match up as there were a couple of versions we looked at. Here are our general comments:
			• Support of climate change policies, funding and continued coordination with OCCRI
			• 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
			• In regards to funding and affordability – integrate concepts throughout, also acknowledge that applying for funds can be a challenge
			• 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
			• Importance of regional partnerships – especially around public outreach, translations and engaging with CBOs
			• Highlight the work water providers are doing to support workforce development through apprenticeships and internships – they should be a partner
			• Need to acknowledge federal ownership of watersheds and land that supply drinking water (under coordination and collaboration)
			• Importance of adaptive planning (throughout the document) that acknowledges that future conditions are influenced by a range of interacting factors
			• Natural hazard mitigation strategies should include actions that ask the public to have an emergency supply of drinking water
			• 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
			• 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.
		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.
			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
	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.		
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 of all sizes.		
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.		
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.		
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.		
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).		

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		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.
			Watershed Councils and OWEB are mentioned on p. 52, but this work could be elaborated on further in the Environmental Stewardship and Recreation section.
		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.
		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.
		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.
		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.
		Action 5A	Land Use Planning: Please see comment from Water Planning section. Adaptive Planning methodology also has applications to 5A, especially water master plans.
		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.
		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.”
			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.
			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.
			8A – DOGAMI should be added to supporting agencies
			8D –Adaptive Planning methodology has applications here – see comments in Water Resources/Supply Info section.
		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.
		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.
		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 <u>water reuse projects must make economic sense to the rate payer and the utility.</u> 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.”

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			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.
		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 e-mailed a copy of your comments.
Rick & Lindsey Noss	Newberg, Yamhill	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.
		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.
		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.
		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.
		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.
		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.
		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.
Robert Bernstein	Portland, Multnomah	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.
		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.
		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.
		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.
		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.
		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.

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		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.
		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.
		Do you have other questions or concerns related to this feedback?	My concern is a lack of public awareness and lack of outreach..
Robert Davidson	Gold Hill	Overall	The Kalamath River dam removal was a disaster, the Rogue River dam removal a disaster. I can't support you any longer.
		Part 1	miss guided
		Are your water concerns addressed by Actions 1A-14B?	Stop supporting dam removal.
Susan Murbach	Waldport, Lincoln County	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 <u>regenerative harvests that help biodiversitiv in our local forests.</u>
		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.
		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.
		Part 2: Ch 3 Data & Analysis	Please test our waters and create safe habitats.
		Part 2: Ch 4 Stewardship	We all need to realize the importance of water stewardship.
		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.
		Do you have other questions or concerns related to this feedback?	Thank you for caring and communicating with local people