

Attachment 3 Considerations for Plan Implementation.

In its review, the Plan Review Team identified a number of considerations for plan implementation. They are documented below and organized by the major sections of plan review criteria: Plan Development, Plan Content, and Plan Adoption and Implementation Strategy.

Plan Development

Plan Review Team Comments on Plan Development
The partnership should continue to reach out to groups or people that did not participate and welcome them to contribute to the overall goals of the Partnership, such as industry (Georgia Pacific) and farmers. The storymaps seem like a good tool for engaging the community in the future.

Plan Content

Plan Review Team Comments on Plan Content
<p>The PRT recognizes that resources available for appropriately assessing instream needs are limited. However, even though ODFW assisted in developing the instream demand at the time, it was acknowledged that the analysis presented in the Plan is inadequate for truly understanding and balancing in and out-of-stream needs. As such, the Plan clearly identifies this as a data gap and has an associated action to update the assessment basin-wide and conduct a full suite of instream needs in high priority locations. A more robust instream demand conducted early in implementation would aid in prioritizing actions.</p> <p>ODFW would be happy to continue collaboration with the Partnership to further refine the Instream Demand as you look towards Plan implementation. Updated ODFW guidance will be available for reference in Spring 2022. The ODFW guidance will aid the Partnership in successfully completing a basin-wide assessment of instream water needs. The Partnership should incorporate Basin-Investigation Report-based recommendations into the assessment, rather than existing instream water rights (ISWRs). ISWRs may have been reduced from the amounts in the applications and therefore may not fully represent instream needs. ODFW can supply the appropriate BIR recommendations. In addition to the BIR-based targets, use of modeled flow data (e.g., StreamStats) would provide a starting point for understanding current and future basin-wide needs in many of the smaller tributaries lacking flow targets. This preliminary analysis would help direct the Partnership as they develop a more focused suite of tools to determine instream flow needs. See “Implementation” section below for more information.</p> <p>Some statements in the draft plan were not as clearly referenced as others. The PRT did not feel this warranted a required improvement but should be considered in implementation so funders and others have confidence or understanding of the sources of information to strengthen Mid-Coast funding proposals.</p>

Plan Adoption and Implementation Strategy

Plan Review Team Comments on Plan Adoption and Implementation

The 10-year implementation plan is not multi-decadal in its vision as the partnership established at its kickoff meeting in September of 2016. The Partnership should consider how it can both focus on the work at hand but have a longer vision.

The need for an updated, defensible projected future demand for municipalities should be a high priority as this will have ramifications for many other imperatives.

The PRT appreciates the focus throughout the document, and specifically in Imperative 4, on water conservation. When considering “how water savings will provide instream or ecological benefits,” the PRT encourages the Partnership to consider WRD’s Allocation of Conserved Water Program or other means to improve and legally protect instream flow as a component of project selection and implementation.

The Ecosystem Protection and Enhancement actions are extremely broad. As the Partnership moves to implementation it may be helpful to have targeted areas described for restoration. The Performance Metrics for this section are also not specific or in some instances measurable in a feasible way. The Potential Leads described in the Action Plan table are general in nature and early confirmation of who will lead or assist with implementation of various the actions will be critical to meeting the goal timelines described.

It would be helpful, either in the plan or otherwise, to make the connection between plan actions and the statewide IWRS recommended actions, so the Commission and others see how the Mid-Coast plan is aligned with the statewide strategy.

The PRT had some concern about the implementation strategy and what is hoped to be accomplished in each of the three phases of implementation in the first 10 years and how it all fits together. This could be made clearer in the plan but is not a required improvement. If not improved in the plan perhaps a vision can be articulated and more specifics described in an implementation kick-off meeting to clarify, which will help partners collaborate during implementation.

ODFW Partnership

- ODFW recommends the following items for consideration as the Partnership moves forward with implementation:
 - More fully characterize basin-wide instream needs **early in implementation** using ODFW’s updated guidance document (expected Spring 2022) to provide a foundational assessment, particularly on streams with sensitive, threatened, or endangered species that currently lack instream targets. The new ODFW guidance builds on your existing analysis and will provide a means to utilize additional data sources for estimating instream needs. ODFW may be able to assist with this analysis as time and resources allow.
 - Use outcomes of the updated instream needs assessment, along with existing data, to identify high-priority locations for projects that address instream needs. Existing data may include (but are not limited to):

- ODFW's Aquatic Habitat Prioritization (expected 2022) and other relevant geospatial datasets that will contribute to location prioritization.
 - Findings from earlier Partnership planning steps.
 - Existing IFIM studies or other studies that address habitat requirements.
 - Sites with water temperature data.
 - Other relevant data from local, state, tribal, and federal partners, and data from other restoration scientists/practitioners (e.g., NGOs, academia, consultants).
- Plan, implement, and monitor pilot projects that focus on:
 - Seasonally Varying Flow (SVF) Targets
 - Existing ODFW instream flow targets are based on species-specific instream needs for each life stage (e.g., springtime flows necessary for steelhead spawning, summer flows for juvenile rearing, and fall flows for Chinook and Coho spawning). Streamflows necessary for broader habitat maintenance and formation (e.g., pool development, gravel recruitment, etc.) are not currently incorporated into ODFW instream flow target development. Present methodologies primarily base late fall-early spring instream flow targets on juvenile rearing and/or egg incubation needs, which are typically minimal relative to natural flow conditions during this period of peak annual flows. ODFW intends to identify and develop techniques for the determination of peak channel maintenance and formation flows in the next several years.
 - Temperature-based Flow Targets
 - Similar to peak habitat maintenance and formation flows, relationships between water temperature, streamflow, and species thermal limits have not, until recently, been incorporated into ODFW instream flow target development. As climate change progresses, water temperature is anticipated to become a primary limiting factor for cold-water species. ODFW is initiating pilot projects around the state to incorporate relationships between water temperature and streamflow into development of instream flow targets. These assessments typically require several years of paired water temperature and streamflow datasets. ODFW is interested in working with the Partnership to scope potential data collection locations and collaborate on water temperature logger deployment and retrieval. Following several seasons of data collection, ODFW would develop updated water temperature-based instream flow targets for study sites, which could aid in prioritizing actions for implementation.
 - Instream Water Right Monitoring
 - ODFW has applied for the vast majority of instream water rights in Oregon, with the intent of identifying and legally protecting the flows necessary for the health of aquatic ecosystems. However, in many parts of the state, these instream water rights are junior to most out-of-stream water rights (senior rights in terms of prior appropriation) and, therefore, result in minimal actual protection of instream flows. ODFW is interested

in collaborating with OWRD and the Partnership to develop a monitoring framework that assesses gaps in stream gage coverage and identifies priority locations for additional gages to improve protection of streamflows afforded by instream water rights.

- Strategic placement of new gages in priority locations can also aide in identifying areas in need of additional instream flow protection or in assessing success of ongoing restoration work.