OREGON
WATER RESOURCES DEPARTMENT

Staff Report

TO: Water Resources Commission

FROM: Ivan Gall, Director

DATE: June 12, 2025

SUBJECT: Agenda Item A
Water Resources Commission

IRRIGATION MODERNIZATION FUNDING RECOMMENDATIONS

I. Introduction

This report describes the multi-agency Technical Review Team (TRT) evaluation process, funding recommendations, and public comments received for the first 2025 funding cycle of Irrigation Modernization Funding. The Commission will be asked to award funding.

II. Integrated Water Resources Strategy Recommended Action

- 13. E – Invest in Implementation of Water Resources Projects

III. Background

In 2023, House Bill 5030 authorized $50 million in funding for irrigation modernization projects that leverage federal funding associated with Natural Resources Conservation Service authorized watershed plans, U.S. Bureau of Reclamation WaterSMART grants, or U.S. Environmental Protection Agency grants that are eligible to be on the Department of Environmental Quality's Intended Use Plan. Per the authorizing bill, the projects must also produce the economic, environmental, and community benefits described in the authorizing statute for OWRD's Water Project Grants and Loans (WPGL) funding opportunity (ORS 541.673).

The Irrigation Modernization Funding is run through the existing WPGL program, and applications are evaluated using the same Scoring Criteria document. Irrigation modernization projects are evaluated in the same manner as WPGL projects with one exception. As directed under House Bill 5030, for irrigation modernization projects involving surface water rights where the project conserves water, priority shall be given to projects that legally protect a portion of the conserved water instream commensurate with the amount required under the approach described in ORS 537.470 (the Allocation of Conserved Water Program).

Since the December Commission meeting, two funding updates have occurred pertaining to the unobligated funds. At the December meeting, the Commission

awarded $907,290 to the Klamath Irrigation District (KID) for the A-3 Urban Canal Piping Project. In January 2025, KID declined the Department's grant due to their project proposal being denied by the US Bureau of Reclamation for their required matching funds. In January 2025, the Lone Pine Irrigation District requested additional funds for their Irrigation Modernization Phase 2 project, which was awarded $775,000 by the Commission in June 2024. Department staff evaluated the request, and in accordance with the delegation of authority granted by the Commission under ORS 536.025 (2) at the Commission meeting on December 12, 2024, the Department approved a one-time budget increase of $77,500, which is a 10% increase of the initial grant award.

IV. 2025 Funding Cycle 1

The Department did not solicit WPGL applications for the 2025 funding cycle due to insufficient funds. There is currently $20,494,551 in unobligated Irrigation Modernization Funds available for the Commission to award for the two 2025 funding cycles.

Application materials for the first 2025 funding cycle for Irrigation Modernization Funding were posted in early November 2024 and the application deadline was January 15, 2025. The Department received four eligible and complete applications requesting a total of $16,191,372 in grant funding for Irrigation Modernization Funding, with individual grant requests ranging from $2,987,447 to $4,942,925.

The Department solicited written comments on complete applications during a 60-day public comment period from January 30 through March 31, 2025. The Department received no public comments on the applications.

Tribal Engagement

The Department contacted affected Tribes directly to solicit comments on complete applications where project work would be conducted on lands where a Tribe may have an interest. Affected Tribes were invited to serve as members of the TRT, submit comments for consideration by the TRT, or submit comments for consideration by the Department and Commission. After the TRT scored and made recommendations on the applications, the Department reached out to affected Tribes to provide an additional opportunity to comment. The Department did not receive comments from Tribes on the applications, or on the TRT rankings and recommendations. No Tribe expressed interested in sitting on the TRT.

V. Grant Application Review Process

TRT Review

A multi-agency TRT evaluated the applications and developed funding recommendations for the Commission. The TRT consisted of staff from the Departments of Environmental Quality, Fish and Wildlife, Business Development, Agriculture, and Water Resources, as well as the Oregon Health Authority and Regional Solutions. The TRT discussed the public benefits of each project and scored

each application. Scoring was based on the potential economic, environmental, and social/cultural public benefits described in the applications. The TRT scored applications during the meeting and assessed the outcomes, which afforded the TRT members the opportunity to discuss the merits of the project proposals and ensure consistent application of the criteria. See Attachment 1 for the TRT project ranking, evaluation summaries, and funding recommendations. See Attachment 2 for applicable rules on public benefit scoring.

The Department updated the Scoring Criteria document used to evaluate Water Project Grants and Loans and Irrigation Modernization applications for this funding cycle (Attachment 3) and made several changes based on lessons learned from previous funding cycles (see Table 1).

Table 1 – Updates to Scoring Scale

Public Benefit	Previous Scoring Scale	Changes to Scoring Scale
Exceptional	12	Score changed to 10
High	6	Score changed to 5
Medium	3	None
Minor	1	May not receive score without supporting evidence or documentation*
No benefit	0	Claims of public benefits are unsupported*
Minor negative impact	-1	None
Medium negative impact	-3	None

** Previously, projects could receive a score of 1, or minor benefit, without supporting evidence or documentation. The updated scoring scale requires TRT members to assign a score of 0 if no supporting evidence or documentation is provided to support the public benefit claim.*

In addition to the scoring scale changes in Table 1 above, the minimum score required in each public benefit category was lowered from 7 to 5 because it is now harder to receive a score of 1 (minor benefit) in each question.

Public Comment on TRT Rankings and Recommendations

The TRT rankings and recommendations were published on the Department's website and distributed via the funding opportunity listserv for a 3-week public comment period, which took place from April 18 through May 9, 2025. The Department received one public comment in support of the TRT funding recommendations and on the program's eligibility criteria (Attachment 4).

VI. 2025 Funding Award Recommendations

There is currently $20,494,551 in unobligated Irrigation Modernization Funds available for the Commission to award for the two 2025 funding cycles. Based on the TRT ranking, the TRT recommends all four projects for funding (Table 2 and Attachment 1). This funding recommendation considers the public benefits provided by these applications. All four projects met the minimum public benefit category scores required to be recommended for funding and there is sufficient funding to meet the requested grant amount.

If approved by the Commission, staff will work with recipients to develop grant agreements. Release of grant funds is contingent on applicants obtaining all applicable local, state, and federal permits and regulatory approvals, as well as meeting match fund requirements.

Table 2 - 2025 Funding Recommendation

Project Name	Funding Request	Total Cost of Project	Funding Recommendation
East Fork Piping Project	$4,942,925	$18,748,700	$4,942,925
North Unit Irrigation District Irrigation Modernization and Winter Flow Augmentation Project – Lateral 43, Segment 3	$2,987,447	$11,969,550	$2,987,447
Klamath Irrigation District D-System Laterals Project	$4,270,000	$19,581,000	$4,270,000
Eastside Canal Piping Project Phase 1	$3,991,000	$4,991,000	$3,991,000
Total	**$16,191,372**	**$55,290,250**	**$16,191,372**

VII. Alternatives

The Commission may consider the following alternatives:

1. Adopt the TRT funding recommendation contained in Table 2 of this report to fund four applications for a total award of $16,191,372.
2. Adopt a modified funding recommendation.
3. Direct the Department to further evaluate the applications and return with a revised recommendation.

VIII. Action Item: Funding Recommendation

The Director recommends Alternative 1, to adopt the funding recommendations contained in Table 2 of this report to fund four applications for a total award of $16,191,372.

Attachments:

1. TRT Ranking and Funding Recommendation
2. Excerpt from Division 93 Rules on Scoring
3. Scoring Criteria Document
4. Public Comment on Funding Recommendations

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Irrigation Modernization Funding Applications

Evaluation Summaries – 2025 Funding Cycle 1

April 18, 2025

Background

The Water Supply Development Account provides grants and loans for water projects that have economic, environmental and social/cultural benefits (ORS 541.651-696). In 2023, the Oregon Legislature passed House Bill 5030, providing $50 million to issue grants for irrigation modernization projects and $10 million for Water Project Grants and Loans. The application deadline for the first 2025 funding cycle was January 15, 2025. The Oregon Water Resources Department (OWRD) received four complete applications requesting a total of $16,191,372 in grant funding for Irrigation Modernization projects. OWRD did not solicit Water Project Grants and Loans applications due to insufficient funds.

Document Description

The following are evaluation summaries for complete grant applications received for the first 2025 Irrigation Modernization Funding cycle. The multi-agency Technical Review Team (TRT) provided comments on each application, scored applications based on the criteria identified within the Scoring Criteria document, and will make a funding recommendation to the Water Resources Commission (Commission) based on that evaluation and available funds. The following evaluation summaries highlight TRT comments gathered by OWRD during the application evaluation process and are prepared for the Commission's consideration and review. Applicants are encouraged to contact the Grants Analyst to request a review meeting and receive additional evaluation feedback. The evaluation summaries are listed in order of the TRT ranking.

The evaluation summary includes a combined public benefit score, which the TRT used to rank proposed projects. A table is also provided that shows a breakdown of the application score by category. An application could score up to 60 points in each of the economic, environmental, and social/cultural public benefit categories. A proposed project could receive up to 30 additional preference points; up to 10 points for legally protecting water instream and up to 10 points for collaboration. Irrigation Modernization projects may receive an additional 10 points for legally protecting water instream commensurate with the amount required under the approach described in ORS 537.470 for a total of 30 preference points. Preference points are listed in the "Other" category. There is a maximum public benefit score of 210 points for Irrigation Modernization projects.

Based on the TRT ranking, the TRT recommends all four Irrigation Modernization projects for funding (Table 1). This funding recommendation considers the public benefits provided by these applications and available funding. OWRD anticipates having $20.5 million available for 2025 Irrigation Modernization funding cycles.

Next Steps

OWRD is soliciting public comment on the TRT ranking and funding recommendation through 5 pm on May 9, 2025. Information on how to submit a public comment is available here. Public comments submitted on the TRT ranking and funding recommendation will be presented to the Commission who will make a funding decision. The date for the Commission to make its funding decision is June 12-13, 2025.

More Information

If you have questions please contact the Grant Analyst, Louisa Mariki, at 503-979-9160 or OWRD.Grants@water.oregon.gov.

Irrigation Modernization Applications

Table 1. Applications Recommended for Funding by the Technical Review Team

Project Name	Applicant	County	Grant Funds Requested	Total Project Cost	Total Score
East Fork Piping Project	East Fork Irrigation District	Hood River	$4,942,925	$18,748,700	119
North Unit Irrigation District Irrigation Modernization and Winter Flow Augmentation Project – Lateral 43, Segment 3	North Unit Irrigation District	Jefferson	$2,987,447	$11,969,550	95
Klamath Irrigation District D-System Laterals Project	Klamath Irrigation District	Klamath	$4,270,000	$19,581,000	56
Eastside Canal Piping Project Phase 1	Talent Irrigation District	Jackson	$3,991,000	$4,991,000	48
		Total	**$16,191,372**	**$55,290,250**	

2025 Applications

Overview of Application Scoring

The scoring criteria for applications to the Water Projects Grants and Loans and Irrigation Modernization funding opportunities are based on the public benefits a project is likely to achieve. Projects funded are those which are likely to achieve the greatest public benefits. The change in conditions anticipated to result in public benefits must be described and explained in the project application. When evaluating an application, the TRT examines public benefits in three categories: economic, environmental, and social/cultural. The TRT evaluates and scores each application based on the following questions and determines whether the project would provide exceptional, high, moderate, minor, or no public benefits, or minor or medium negative impacts. See the Scoring Criteria document for more information.

	Question
Economic Public Benefits	a. Does the project create or retain jobs?
	b. Does the project increase economic activity?
	c. Does the project result in increases in efficiency or innovation?
	d. Does the project result in enhancement of infrastructure, farmland, public resource lands, industrial lands, commercial lands or lands having other key uses?
	e. Does the project enhance economic value associated with tourism or recreational or commercial fishing, with fisheries involving native fish of cultural significance to Indian tribes, or with other economic values resulting from restoring or protecting water instream?
	f. Does the project result in increases in irrigated land for agriculture? (which may include increasing irrigated acres, agricultural economic value, or productivity of irrigated land)
Environmental Public Benefits	a. Does the project result in measurable improvement in protected streamflows?
	b. Does the project result in water conservation?
	c. Does the project result in measurable improvement in groundwater levels that enhances environmental conditions in groundwater restricted areas or other areas?
	d. Does the project result in a measurable improvement in the quality of surface water or groundwater?
	e. Does the project increase ecosystem resiliency to climate change impacts?
	f. Does the project result in improvements that address one or more limiting ecological factors in the project watershed?
Social/Cultural Public Benefits	a. Does the project promote public health and safety and of local food systems?
	b. Does the project result in measurable improvements in conditions for members of minority or low-income communities, economically distressed rural communities, tribal communities or other communities traditionally underrepresented in public processes?
	c. Does the project promote recreation and scenic values?
	d. Does this project contribute to the body of scientific data publicly available in this state?
	e. Does this project promote state or local priorities, including but not limited to the restoration and protection of native fish species of cultural significance to Indian tribes?
	f. Does this project promote collaborative basin planning efforts, including but not limited to efforts under Oregon's Integrated Water Resources Strategy?

East Fork Piping Project

Applicant Name: East Fork Irrigation District

County: Hood River

Funding Requested: $4,942,925

Total Project Cost: $18,748,700

Project Summary: The primary goals of the project are to increase the long-term reliability and efficiency of irrigation water supply, increase summer stream flows for threatened salmon and Steelhead, and improve water quality. To achieve these goals, the project would replace approximately 12 miles of failing, leaky pipe (primarily wood and unreinforced concrete) with new high-density polyethylene pipe; pipe approximately 5 miles of open canal; eliminate an estimated 23 end spills; eliminate open water boxes; and add pressure reducing valves and turnouts for patrons. The project would save an estimated 3.2 cubic feet per second (cfs) of water. The applicant would legally protect 75 percent (approximately 2.4 cfs) of the conserved water instream in the East Fork Hood River through the Department's Allocation of Conserved Water program. Twenty-five percent (approximately 0.8 cfs) of the conserved water would be used by the applicant to improve water supply reliability for irrigators.

Technical Review Team Score and Comments

TRT Recommendation: Recommended for Funding

Public Benefit Scores:

Total Score	Economic	Environmental	Social/Cultural	Other
119	30	28	31	30

Economic Public Benefits:
The review team found the proposed project would likely result in:

a) High public benefit from this project through the creation or retention of 178 temporary jobs. The review team also noted the high number of indirect jobs the project would support in other sectors.

b) High public benefit from an increase in economic activity in Hood River County. The review team noted the reliance on agricultural industry and water availability in the local area. The proposed project would also benefit from agritourism and related recreation.

c) High public benefit in increases to efficiency and innovation through improvement of East Fork Irrigation District's (EFID) water delivery infrastructure, which would help to eliminate seepage, evaporation, and end spills in the project area. The project would create district-wide energy savings and reduce EFID's operation and maintenance costs.

d) High public benefit as the project would result in the enhancement of infrastructure for EFID, including new screens to reduce sediment and debris in irrigation water.

e) Moderate to high public benefit in the enhancement of economic value associated with tourism and native fish of cultural significance to the Confederated Tribes of Warm

Springs, including Chinook salmon, steelhead, rainbow and cutthroat trout, and pacific lamprey.

f) High public benefit to the increases in agricultural economic value and productivity of irrigated land with more reliable water supply, improving irrigation water delivery, reliability, and quality overall.

Environmental Public Benefits:

The review team found the proposed project would likely result in**:**

a) Exceptional public benefit from the project's proposal to legally protect 75% of conserved water through the Department's Allocation of Conserved Water program. The review team noted that the amount of water, approximately 2.4 cfs, will have a significant ecological benefit, particularly for salmon and steelhead fish species.

b) Moderate public benefit to water conservation. The project would irrigate the same acreage with 14.5% less water.

c) No public benefit to the improvement of groundwater levels.

d) High public benefit to water quality as a result of increased streamflow and elimination of end spills.

e) Moderate to high public benefit for increase in the ecosystem's resiliency to climate change from the increased streamflow during critical summer months, which would decrease water temperatures and reduce risk of drought on aquatic species, plants and wildlife.

f) High public benefit to limiting ecological factors related to the increased flows and improvements to water quality, temperature, and habitat for native species in summer.

Social/Cultural Public Benefits:

The review team found the proposed project would likely result in**:**

a) Moderate public benefit from the impact to local food systems and the high value fruit crops grown in the region.

b) High public benefit to the improvement in conditions for Oregon's environmental justice communities through the protection of instream water supporting tribal fishery recovery efforts. Additionally, the project supports the migrant workforce of the growing Hispanic community representing 30% of the total population in Hood River County.

c) Moderate to high public benefit from increased streamflow for recreational activities such as rafting, kayaking, and swimming, or to fish populations for sport fishing. Agritourism related to scenic pear, apple, and cherry blossoms would also benefit from the project.

d) No public benefit to the contribution of new scientific data.

e) Exceptional public benefit because the project promotes several state and local planning efforts related to increasing summer flows benefiting fish species and habitat and enhancing tribal priority and recovery efforts.

f) Exceptional public benefit because the proposed project supports collaborative basin planning efforts. The proposed project is identified in multiple collaboratively developed Hood River plans and is in alignment with Oregon's Integrated Water Resources Strategy.

North Unit Irrigation District Irrigation Modernization and Winter Flow Augmentation Project – Lateral 43, Segment 3

Applicant Name: North Unit Irrigation District

County: Jefferson

Funding Requested: $2,987,447

Total Project Cost: $11,969,550

Project Summary: The proposed project would enclose a portion of Lateral 43, a 7.3-mile open, porous irrigation canal into leak-free HDPE piping to conserve approximately 5.3 cubic-feet-per-second of water previously lost to seepage according to the District's System Improvement Plan. The District would release an equivalent amount of the conserved water saved during the winter season in Upper Deschutes River protected from Wickiup Dam to Lake Billy Chinook via a secondary use right for flow augmentation. The water conservation achieved by this project would: (1) eliminate water delivery and operations inefficiencies; (2) improve water quality; (3) improve and stabilize agricultural production through water supply reliability; and (4) improve conditions for Endangered Species Act-listed species including the Oregon spotted frog.

Technical Review Team Score and Comments

TRT Recommendation: Recommended for funding

Public Benefit Scores:

Total Score	Economic	Environmental	Social/Cultural	Other
95	27	19	24	25

Economic Public Benefits:

The review team found the proposed project would likely result in**:**

a) High public benefit from the creation of approximately 65 temporary construction jobs. These jobs hold a significant value in a small, rural community.

b) Moderate public benefit to economic activity. The project will stimulate the local economy through job creation and support for local services. Additionally, increased water reliability is anticipated to result in higher hay yields.

c) High public benefit in increased efficiency due to the conservation of 37% of water currently lost to seepage, significantly improving irrigation efficiency and drought resilience.

d) High public benefit as the project would result in improved functionality and reliability of essential infrastructure for the North Unit Irrigation District (NUID). The conserved water would be available to patrons during the irrigation season and would reduce the need for fallowing, allowing for the continued production of high value and specialty crops.

e) Moderate public benefit in the enhancement of economic value associated with recreation or fishing.

f) High to exceptional public benefit to the increase in agricultural value and productivity of land by conserving 5.3 cfs of water, addressing the district's vulnerability due to junior water rights and helping to prevent land fallowing.

Environmental Public Benefits:

The review team found the proposed project would likely result in**:**

a) High public benefit from the project's proposal to release an equivalent amount of the conserved water saved during the winter season in Upper Deschutes River from Wickiup Dam to Lake Billy Chinook via a secondary use right for flow augmentation. This additional instream water would improve habitat conditions for fish and the ESA-listed Oregon spotted frog.

b) High public benefit in water conservation from 37% reduction in seepage losses.

c) Minor public benefit to groundwater levels due to surface–groundwater interaction.

d) Moderate public benefit in the improvement of surface water quality by reducing sediment and turbidity in the Upper Deschutes River during the non-irrigation season.

e) Moderate public benefit to the increase in ecosystem resiliency due to winter flows supporting habitat and climate adaptation for the Oregon spotted frog.

f) Moderate public benefit to limiting ecological factors. The project supports winter habitat improvements but does not directly address summer streamflow or temperature issues affecting salmonids during the irrigation season.

Social/Cultural Public Benefits:

The review team found the proposed project would likely result in**:**

a) High public benefit to local food systems as lands served by the district are dedicated to high-value crops. The application describes how the proposed project promotes public safety by addressing canal-related drowning risks and dust-related hazards.

b) Moderate benefit for Oregon's environmental justice communities. NUID serves Jefferson County, which has a higher proportion of low-income populations and environmental justice communities.

c) Minor public benefit for recreational and scenic values. The project plans to plant native grasses to improve scenic views but lacks measurable outcomes.

d) Minor public benefit to the contribution of scientific data. While the application indicated some stream gauge monitoring is planned, it is unclear whether it adds new, meaningful data beyond existing efforts.

e) High public benefit because the project supports numerous state and local priorities related to water conservation goals.

f) Exceptional public benefit due to strong integration with broader basin-scale conservation and planning initiatives, demonstrating proactive and coordinated efforts to protect water.

Klamath Irrigation District D-System Laterals Project

Applicant Name: Klamath Irrigation District

County: Klamath

Funding Requested: $4,270,000

Total Project Cost: $19,581,000

Project Summary: The goal of the proposed project is to improve water management within the Klamath Irrigation District to benefit agricultural producers, native endangered fish species, and overall Klamath Basin water supplies. To achieve this goal, the project would replace 11.4 miles of open earthen channels with gravity-fed pipelines and line 1.1 miles of the District's D-System. The project would: (1) improve water delivery reliability for agricultural producers within the District and downstream irrigation districts; (2) save approximately 4,021 acre-feet per year by eliminating water lost to seepage and evaporation; (3) retain more water in Upper Klamath Lake later in the summer, supporting resident fish species; (4) reduce demand for supplemental inputs from the Lost River; (5) reduce pumping costs for adjacent districts due to decreased spill; and (6) improve irrigation water quality for agricultural use.

Technical Review Team Score and Comments

TRT Recommendation: Recommended for funding

Public Benefit Scores:

Total Score	Economic	Environmental	Social/Cultural	Other
56	24	6	21	5

Economic Public Benefits:

The review team found the proposed project would likely result in**:**

a) Moderate public benefit due to the 133 temporary construction jobs that would be created as a result of this project and the 29 permanent agricultural jobs that would be retained.

b) Moderate to high public benefit to economic activity. The project would spend more than $19 million in a rural community and increase the long-term economic viability of agriculture in the area.

c) High public benefit in increases in efficiency. The proposed project would enhance irrigation efficiency in the Klamath basin and eliminate water loss.

d) High public benefit due to infrastructure improvements. Piping 11 miles of open canal would conserve water and enhance agricultural reliability. This would support more consistent crop production and use of higher value crops in an area where land is often fallowed due to water shortages.

e) Minor public benefit in the enhancement of economic values identified in statute. The review team found it is unlikely the water savings would benefit native fish.

f) High to exceptional public benefit to the increase in agricultural value. The project would save approximately 4,021 acre-feet per year through piping and lining canals which would increase the productivity and agricultural value of over 5,000 acres.

Environmental Public Benefits:

The review team found the proposed project would likely result in**:**

a) No public benefit as the project is not proposing to legally protect water instream.

b) Minor public benefit in water conservation. The project anticipates reducing water use by 5.3% because of the irrigation infrastructure improvements.

c) No public benefit from improvements to groundwater levels.

d) Moderate public benefit from improvements to water quality. The proposed project would result in some improvement to agricultural water quality within the district but is unlikely to benefit water quality in Upper Klamath Lake.

e) Minor to moderate public benefit to the increase in ecosystem resiliency to climate change impacts due to the possibility of retaining conserved water in Upper Klamath Lake for longer periods during the irrigation season.

f) No public benefit from addressing limiting ecological factors. The conserved water would be utilized primarily for irrigation water.

Social/Cultural Public Benefits:

The review team found the proposed project would likely result in**:**

a) Moderate to high benefit to public safety and of local food systems. The project supports local food systems by enhancing irrigation systems for 5,550 acres, improving food security and farm viability. The project would also reduce risks associated with open canals, such as drownings.

b) Moderate benefit for environmental justice communities. The project has consistently engaged the Klamath Tribes. The region is economically distressed and drought-prone, therefore induced benefits from agricultural improvements would provide value.

c) No public benefit from recreational or scenic values.

d) No public benefit to the contribution of new scientific data.

e) High to exceptional public benefit from alignment with state and local priorities. The project supports state goals around agricultural resilience and water supply reliability, aligning with the Integrated Water Resources Strategy and receiving broad support, including from Tribes.

f) High public benefit for collaborative basin planning efforts. The application provided evidence of public engagement and alignment with broader basin goals.

Eastside Canal Piping Project Phase 1

Applicant Name: Talent Irrigation District

County: Jackson

Funding Requested: $3,991,000

Total Project Cost: $4,991,000

Project Summary: The goal of the proposed project is to improve water management within the Talent Irrigation District to benefit agricultural producers and overall Rogue Basin water supplies. To achieve this goal, the project would convert the first 4,363 feet of the open earthen Eastside Canal into 72-inch diameter pipe. The project would: (1) save approximately 437.6 acre-feet per year by eliminating water lost from seepage and evaporation; (2) improve water delivery reliability and irrigation water quality for agricultural producers within the District and for downstream irrigation districts; (3) retain more water in Emigrant Lake, extending the District's irrigation season during drought; (4) reduce operations and maintenance costs for the District; and (5) contribute 25 percent of the water savings instream in Emigrant Creek to improve water quality and the recovery of the federally listed Southern Oregon/Northern California Coast coho salmon in the Bear Creek watershed.

Technical Review Team Score and Comments

TRT Recommendation: Recommended for funding

Public Benefit Scores:

Total Score	Economic	Environmental	Social/Cultural	Other
48	22	6	15	5

Economic Public Benefits:

The review team found the proposed project would likely result in**:**

a) High public benefit from the 32 construction sector jobs that would be created or retained by the project. The project would indirectly support 50 jobs within the local economy for the duration of the project.

b) Moderate public benefit from increases in economic activity due to the increased long-term viability of businesses and water reliability for agricultural operations.

c) High public benefit to increased efficiency by replacing the open Eastside Canal with pipe, which would reduce water loss through seepage, and increase infrastructure reliability.

d) Moderate public benefit in the project's enhancement of infrastructure by piping the first 4,363 feet of the Eastside Canal.

e) Minor public benefit from enhanced economic values identified in statute from the proposed project. The basin is a significant area for fisheries involving native fish and sensitive species, but the review team noted multiple downstream diversions would likely divert the conserved water since the mechanism to legally protect the water is unclear.

f) High public benefit due to the increase of the economic value and productivity of 10,977 acres of agricultural land. The review team noted drought conditions have significantly impacted Jackson County.

Environmental Public Benefits:
The review team found the proposed project would likely result in**:**

a) No public benefit to the measurable improvement in protected streamflows. While the review team appreciated the applicant's commitment to protect 25% of the conserved water, the legal mechanism by which the applicant would do so was not clearly identified or deemed feasible.

b) Minor public benefit from water conservation. The project would reduce water use by 5%.

c) No public benefit from improvement in groundwater levels.

d) Moderate public benefit to the measurable improvement of water quality. The review team noted claims to improve water quality in Bear and Emigrant Creek would be strengthened with a clear mechanism for protecting water instream.

e) Minor public benefit to increased ecosystem resiliency to climate change impacts.

f) Minor public benefit to addressing limiting ecological factors due to the uncertainty of how the conserved water will be protected instream.

Social/Cultural Public Benefits:
The review team found the proposed project would likely result in**:**

a) Moderate public benefit to the promotion of public health and safety of local food systems. The project would support agricultural tourism as Talent Irrigation District provides water to irrigated farmland that produce high value crops produced. Public safety would be improved through the elimination of harmful algae blooms.

b) Moderate public benefit due to this region being economically distressed with high unemployment rates. Increased water security and support of agricultural industry will help benefit the conditions for Oregon's environment justice communities.

c) Minor public benefit to the promotion of recreational or scenic values through improved agricultural tourism.

d) No public benefit to the contribution of new scientific data.

e) Moderate public benefit in the promotion of state and local priorities. The proposed project would promote priorities including infrastructure modernization, economic resiliency, and agricultural efficiency.

f) High public benefit to collaborative planning efforts. The project supports recommended actions in Oregon's Integrated Water Resources Strategy and the application included several letters of support.

Excerpt from Division 93 Rules on Scoring
Water Project Grants and Loans

OAR 690-093-0090

Scoring and Ranking; funding decisions

(1) The primary elements in the process of scoring and ranking of applications include the following:
- (a) Initial review for completeness by the Department;
- (b) Public comment;
- (c) The Technical Review Team conducts the initial scoring and ranking for the projects, considers comments from applicants and the public and makes loan and grant funding recommendations to the Commission; and
- (d) The Commission determines the final scoring and ranking of projects, provides for additional public comment, and makes the final decision regarding which projects are awarded loans or grants from the account.

(2) The Technical Review Team scoring methodology shall rank applications based upon the public benefits of the project and additional considerations set forth in ORS 541.677 subsection (1)(b), (1)(d) and (1)(e). The Technical Review Team shall use a score sheet provided by the Department. Each of the three public benefit categories shall be given equal importance in the evaluation and will have scoring sublevels including but not limited to the following:
- (a) The evaluation of economic benefits for a project based on the changes in economic conditions expected to result from the project related to:
  - (A) Job creation or retention;
  - (B) Increases in economic activity;
  - (C) Increases in efficiency or innovation;
  - (D) Enhancement of infrastructure, farmland, public resource lands, industrial lands, commercial lands or lands having other key uses;
  - (E) Enhanced economic value associated with tourism or recreational or commercial fishing, with fisheries involving native fish of cultural significance to Indian tribes or with other economic values resulting from restoring or protecting water in-stream; and
  - (F) Increases in irrigated land for agriculture.
- (b) The evaluation of environmental benefits for a project based on the changes in environmental conditions expected to result from the project related to:
  - (A) A measurable improvement in protected streamflows that:
    - (i) Supports the natural hydrograph;
    - (ii) Improves floodplain function;
    - (iii) Supports state or federally listed sensitive, threatened or endangered fish species;
    - (iv) Supports native fish species of cultural importance to Indian tribes; or
    - (v) Supports riparian habitat important for wildlife;
  - (B) A measurable improvement in groundwater levels that enhances environmental conditions in groundwater restricted areas or other areas;
  - (C) A measurable improvement in the quality of surface water or groundwater;
  - (D) Water conservation;
  - (E) Increased ecosystem resiliency to climate change impacts; and
  - (F) Improvements that address one or more limiting ecological factors in the project watershed.
- (c) The evaluation of the social or cultural benefits for a project based on the changes in social or cultural conditions expected to result from the project related to:
  - (A) The promotion of public health and safety and of local food systems;
  - (B) A measurable improvement in conditions for members of minority or low-income communities, economically distressed rural communities, tribal communities or other communities traditionally underrepresented in public processes;
  - (C) The promotion of recreation and scenic values;

(D) Contribution to the body of scientific data publicly available in this state;
(E) The promotion of state or local priorities, including but not limited to the restoration and protection of native fish species of cultural significance to Indian tribes; and
(F) The promotion of collaborative basin planning efforts, including but not limited to efforts under the state Integrated Water Resources Strategy.

(3) Scoring sublevels shall have a numeric point scale that accounts for positive and negative effects of the project. Sublevel scores shall be summed to a public benefit category level. The Department shall set a minimum score for the application to proceed.

(4) The Technical Review Team will use the total score from the score sheet provided by the Department to rank all applications and make loan and grant funding recommendations to the Commission.

(5) The Commission shall determine the final scoring and ranking of projects and make the final decision regarding which projects are awarded loans or grants from the account based on criteria in OAR 690-093-0100.

(6) The Department shall document the ranking of all applications and make the application ranking publicly available after the funding decisions by the Commission have been published.

WATER PROJECT GRANTS AND LOANS

&

IRRIGATION MODERNIZATION FUNDING


New center pivot in Wallowa County

SCORING CRITERIA

NOVEMBER 2024


Piping in Deschutes County


Instream water transfer in Klamath County

OREGON
WATER RESOURCES DEPARTMENT

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Questions?

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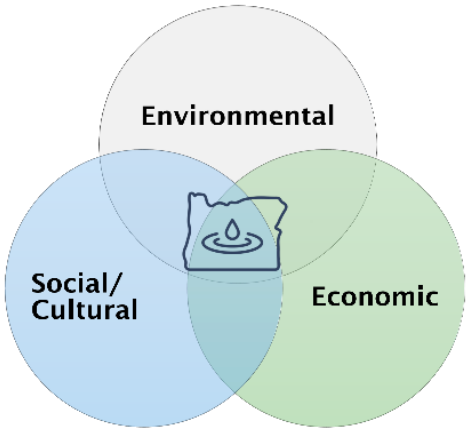
Document Purpose

The scoring criteria for applications to the Water Projects Grants and Loans and Irrigation Modernization funding opportunities are based solely on the public benefits a project is likely to achieve. This document provides an overview of each of the public benefits, describes how the Technical Review Team (TRT) will score the public benefits, and provides recommendations for what information an application should include.

Overview of Application Scoring

Projects funded are those which are likely to achieve the greatest public benefits. The change in conditions anticipated to result in public benefits must be described and explained in the project application. When evaluating an application, the TRT examines public benefits in three categories: economic, environmental, and social/cultural. **To be funded, projects must achieve a minimum score of five in each category.** As discussed below, this is a competitive funding opportunity where projects are ranked according to public benefits, therefore achieving a minimum score does not guarantee funding.



When applicants describe the project's public benefits in their application, they should include a description of the conditions prior to and following project implementation, and clearly demonstrate the extent to which the project is expected to result in a change in conditions that will provide a public benefit. When possible, applicants should quantify the project's public benefits. The TRT will only consider public benefits derived from the tasks and project scope contained within the application and the likelihood of achieving those benefits. Public benefits related to future phases (beyond the scope of the proposed project), or unrelated activities, will not be scored and should not be included in the application. Likewise, public benefits related to past activities will not be considered.

Each category contains six specific public benefits for a total of 18 possible public benefits. The project must provide some benefit in each of the three categories to be eligible for funding. Each of the three public benefit categories is given equal importance in the evaluation. Projects do not need to score in all six benefits within a category but must provide benefit in each of the three categories. It is not expected or likely that any project will have public benefits in all 18 public benefit questions.

Application Review Process

1

Application

Applicants submit Water Project Grants and Loan (WPGL) or Irrigation Modernization Funding (IMF) application by due date.

OWRD reviews applications for completeness and eligibility. OWRD notifies applicants of completeness and eligibility determination.

2

Public Comment Period on Applications

OWRD posts complete applications on the WPGL/IMF website for a 60-day public comment period and contacts affected Tribes.

3

Application Evaluation

A multi-agency Technical Review Team (TRT) evaluates the applications based on the economic, environmental and social/cultural public benefits the project would achieve and reviews the public comments received.

The TRT meets to discuss and score applications and develops a project ranking and funding recommendation.

4

Public Comment Period on Funding Recommendations

OWRD posts the TRT funding recommendations for a public comment period or accepts public comment at the Water Resources Commission meeting before funding decisions.

5

Funding Decision

OWRD staff present the TRT funding recommendation, and any public comments received to the Water Resources Commission for a funding decision.
When making a funding decision, the Water Resources Commission (Commission) considers:

1) the public benefits as evaluated by the TRT;
2) public comments received on the TRT ranking; and
3) funding projects of diverse sizes, types and geographic locations.

6

Funding Awards

OWRD enters into grant agreements with award recipients.

Scoring Scale Used in Evaluation of Public Benefits

Each of the public benefits will be scored according to the scale described below.

Exceptional public benefit: 10 points

- The project is likely to achieve benefits of an exceptionally high standard or quality.
- The outcomes are very significant, measurable, and represent a key or critical advancement.
- The application includes supporting information and evidence describing the anticipated change in conditions as a result of the project.
- The application includes all necessary information to document a high likelihood of success to achieve the public benefit.

High public benefit: 5 points

- The project is likely to achieve public benefits meeting a high standard of quality.
- The outcomes are significant or represent an important advancement.
- The application includes supporting information and evidence describing the anticipated change in conditions as a result of the project.
- The application includes sufficient information to achieve the anticipated public benefit.

Medium public benefit: 3 points

- The project is likely to achieve moderate public benefit.
- The outcomes are likely to achieve an improvement in conditions.
- The application includes supporting information and evidence describing the anticipated change in conditions as a result of the project.

Minor public benefit: 1 point

- The project may achieve minor public benefits.

No benefit: 0 points

- The project is not likely to achieve a public benefit.
- The claims of public benefits are unsupported.
- No positive or negative impact related to the public benefit. No change.

Minor negative impact or detriment: -1 point

- The project may have a minor negative effect or impact to this category.

Medium negative impact or detriment: -3 points

- The project is likely to cause moderate harm and have a negative impact to this category.

Public Benefit Questions and Application Tips

Category 1. Economic benefits

The evaluation of economic benefits of a project is based on the change in economic conditions expected to result from the project as demonstrated in the application.

1a. Does the project create or retain jobs?

Job creation means the project would result in new jobs. Retention means the project would prevent the loss of jobs. Job creation and retention benefits may include direct effects within the organization that owns or operates the project, or it may include indirect effects on retail customers or consumers of the project. Temporary jobs resulting from the project will not receive as high of a score as permanent jobs.

Application tip*: Quantify the number and identify the type of jobs to be created or retained as a result of the project. Describe the value of the increase or retention of jobs to the local economy.*

Exceptional: 10 pts	*Exceptional* increases in the creation or retention of permanent jobs which provide key or critical benefit in the geographic area or employment sector
High: 5 pts	Increases in the creation or retention of permanent jobs which provide an important benefit in the geographic area or employment sector
Medium: 3 pts	*Moderate* increase in the creation or retention of permanent jobs, or seasonal jobs important to the geographic area or employment sector
Minor: 1 pt	*Minor* increase in jobs, temporary jobs, or job retention.
No benefit: 0 pts	The project is not likely to achieve new jobs or impact job retention *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential for *minor job losses*
Medium detriment: -3 pts	*Moderate* job losses or a decrease in jobs is likely

1b. Does the project increase economic activity?

Economic activity is associated with the production, distribution, and consumption of goods and services. Such economic activity could occur within one or more entities/businesses and includes an increase in production, gross sales, or net revenue compared to the year preceding project completion. It also includes but is not limited to the arrival of new firms, renewed contracts, and increased orders.

Application tip: *Include information citing economic development plans or other economic activity which would be made possible or supported by the proposed project. If the proposed project protects or maintains current economic activity, demonstrate the degree to which economic activity would decline if the proposed project were not completed and why.*

Exceptional: 10 pts	*Exceptional (five or more years)* increase in long-term economic activity of vital, or key importance are likely to occur
High: 5 pts	Increases in long-term economic activity with the potential to support future activity important to the area/sector
Medium: 3 pts	*Moderate* (*one to four years)* increase in economic activity
Minor: 1 pt	*Minor, short-term (less than one year)* increase in economic activity

No benefit: 0 pts	Increased economic activity *not likely* to occur, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential for *minor losses or decreases* in economic activity
Medium detriment: -3 pts	*Moderate losses or decreases* in economic activity are likely

1c. Does the project result in increases in efficiency or innovation?

Increase in efficiency means the project would make improvements in performance or functionality resulting in less effort or waste. Increase in innovation means that new, creative solutions and ideas would be implemented. Examples of increases in efficiency and innovation include water system efficiencies such as system redundancy (back-up, inter-ties), eliminating leakage, innovative production techniques, energy savings (e.g., the energy required to move, treat, or heat water), and time savings.

Exceptional: 10 pts	*Exceptional* increase in efficiency and innovation
High: 5 pts	*High* Increases in efficiency or innovation
Medium: 3 pts	*Moderate* increases in performance
Minor: 1 pt	*Minor* increases
No benefit: 0 pts	Increased efficiency or innovation not likely *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential for *minor decreases* in efficiency or innovation
Medium detriment: -3 pts	*Moderate decreases* in efficiency or innovation are likely

1d. Does the project result in enhancement of infrastructure, farmland, public resource lands, industrial lands, commercial lands or lands having other key uses?

Enhancement of infrastructure, including municipal infrastructure, farmland, public resource lands, industrial lands, commercial lands and other lands means that the value, effectiveness, or reliability of such infrastructure or lands would increase as a result of project implementation. This includes an increase in the re-sale or rental value of the land or improvements, including: maintained, repaired, or upgraded infrastructure; maintained or buffered riparian areas; and maintained or improved soils.

Exceptional: 10 pts	*Exceptional* enhancements of infrastructure or land
High: 5 pts	*High* quality of enhancements to infrastructure or land
Medium: 3 pts	*Moderate* enhancements
Minor: 1 pt	*Minor* enhancements
No benefit: 0 pts	Enhancements *not likely, OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential that infrastructure or lands will be *degraded or removed* from productive uses (minor negative change)
Medium detriment:-3 pts	Infrastructure or lands that are *degraded or removed* from productive uses (moderate negative change)

1e. Does the project result in enhancement of the economic value associated with: tourism, recreation, fishing (recreational or commercial), fisheries involving native fish of cultural significance to Indian tribes, or other economic values resulting from restoring or protecting water instream?

Examples of enhancement of these economic values include increases in: daily park fees, tour guide revenues, boat or gear rentals, fishing licenses, or hospitality and lodging.

Exceptional: 10 pts	*Exceptional* increased value of tourism, recreation, fishing, fisheries involving native fish of cultural significance to Indian tribes, or other economic values resulting from restoring or protecting water instream are likely
High: 5 pts	A *high* quality of increased value is likely
Medium: 3 pts	*Moderate* increased value
Minor: 1 pt	*Minor* increased value
No benefit: 0 pts	Enhanced values *not likely*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential for *minor decrease*s in the economic value of tourism, recreation, fishing, fisheries involving native fish of cultural significance to Indian tribes, or other economic values resulting from restoring or protecting water instream
Medium detriment: -3 pts	*Moderate decreases* in the economic value of tourism, recreation, fishing, fisheries involving native fish of cultural significance to Indian tribes, or other economic values resulting from restoring or protecting water instream

1f. Does the project result in increases in irrigated land for agriculture? (which may include increasing irrigated acres, agricultural economic value, or productivity of irrigated land)

Increases in irrigated land for agriculture mean that the numbers of acres (acreage) to be irrigated after project completion would be greater than what could previously be irrigated, or that the agricultural economic value or productivity of current irrigated land would increase. Acreage can include lands that were never historically in production or lands that were historically in production but were taken out of production as a result of insufficient water supply.

Application tip: *Highlight the amount of land currently in production in the area, identify the quantity of additional acreage to be irrigated, and calculate the percentage increase in irrigated acreage that would result from the project. Cite scientific articles, reports, or studies and estimate the percentage increase in irrigated crop's economic value or productivity.*

Exceptional: 10 pts	*Exceptional increase* in irrigated acreage, or agricultural economic value or productivity
High: 5 pts	*High* increase in irrigated acreage, or agricultural economic value or productivity
Medium: 3 pts	*Moderate* increase in irrigated acreage or agricultural economic value or productivity
Minor: 1 pt	*Minor* increase
No benefit: 0 pts	Increased irrigated land or increased value or productivity *not likely*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential for *minor decreases* in agricultural economic value or productivity or irrigated land for agriculture
Medium detriment: -3 pts	*Moderate decreases* irrigated land for agriculture or agricultural economic value or productivity are likely

Category 2. Environmental benefits

The evaluation of the environmental benefits of a project is based on the change in environmental conditions expected to result from the project as demonstrated in the application.

2a. Does the project result in measurable improvements in protected streamflows?

Protected streamflow means water that remains in or is released into the natural channel ***and*** is legally protected by the State in order to achieve one or more of the following:

(A) Supports the natural hydrograph;
(B) Improves floodplain function;
(C) Supports state- or federally-listed sensitive, threatened or endangered fish species;
(D) Supports native fish species of cultural importance to Indian tribes; **or**
(E) Supports riparian habitat important for wildlife.

Application tip: *To score in this category an application **must** describe the legal means by which water would be protected by the State, as well as the quality, timing, duration, or other value this streamflow would contribute. The application must also describe how the legally protected water will achieve (A) through (E) listed above (e.g., how water transferred instream through the Allocation of Conserved Water will support, enhance, or improve riparian habitat for wildlife and the extent to which that water will achieve that benefit).*

Identifying which water rights will be protected instream will provide clarifying information for the evaluation.

Exceptional: 10 pts	Project water (or equivalent volume) is legally protected instream by the State and streamflow supports *exceptional* achievement **in each criteria** (A) through (E)
High: 5 pts	Project water (or equivalent volume) is legally protected instream by the State and streamflow supports achievements of a *high quality* in a combination of criteria (A) through (E)
Medium: 3 pts	Project water (or equivalent volume) is legally protected instream by the State and streamflow supports *moderate* achievement in a combination of (A) through (E)
Minor: 1 pt	Project water (or equivalent volume) is legally protected instream by the State and streamflow supports *minor* achievement in a combination of (A) through (E)
No benefit: 0 pts	Improvements in protected streamflow *unlikely, OR streamflow would not be legally protected by the State*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential *minor decreases* to protected streamflow
Medium detriment: -3 pts	*Moderate decreases* protected streamflow (e.g., proposes to reverse an instream lease)

2b. Does the project result in water conservation?

Water conservation is reducing water use to achieve the same outcomes by modifying the technology or method of diverting, transporting, applying, or recovering water.

Application tip: *Identify the quantity of water reduction, by comparing what water would be needed to accomplish the task after project completion with what was previously used to achieve the same task.*

Exceptional: 10 pts	*40 percent or more* reduction in water use to achieve the same outcomes
High: 5 pts	*21-40 percent* reduction in water use to achieve the same outcomes
Medium: 3 pts	*11-20 percent* reduction
Minor: 1 pt	*Minor (<10 percent)* reduction
No benefit: 0 pts	Water conservation *not likely*, *OR* claims are *unsupported*
Minor detriment: -1 pt	*Potential for additional water used* to achieve the same outcomes (e.g., sacrificing water efficiency for energy/pumping efficiency)
Medium detriment: -3 pts	*Additional water used* to achieve the same outcomes (e.g., sacrificing water efficiency for energy/pumping efficiency)

2c. Does the project result in measurable improvement in groundwater levels that enhance environmental conditions in groundwater restricted areas or other areas?

Measurable improvement in groundwater levels mean that groundwater declines would be reduced or eliminated and/or groundwater levels would increase. Stabilization or improvement in groundwater levels could come from aquifer storage and recovery, artificial recharge projects, natural recharge, or discontinued / reduced groundwater use.

Application tip: *Cite and use quantitative measurements to indicate current levels, and method and frequency that improvements would be measured. If applicable, indicate if these improvements would occur in a groundwater restricted area.*

Exceptional: 10 pts	*Exceptional* improvement in groundwater levels
High: 5 pts	*High* quality of improvement
Medium: 3 pts	*Moderate* improvement
Minor: 1 pt	*Minor* improvement to groundwater levels
No benefit: 0 pts	Improved groundwater levels *not likely*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	*Potential for minor groundwater declines*
Medium detriment: -3 pts	Moderate groundwater declines are likely

2d. Does the project result in measurable improvement in the quality of surface water or groundwater?

Water quality parameters include but are not limited to: temperature, dissolved oxygen, contaminated sediments, toxic substances, bacteria, or nutrients. Improvements could result from a higher quality of water discharged to surface water or injected into groundwater, from increased flow, from treatment or filtration of water already in the environment, or removal of a known contaminant.

Application tip: *Any improvement must be measurable or quantifiable. One must be able to measure or determine the change in quality before and after project implementation. Cite and use currently available baseline water quality data. Include a water quality monitoring proposal for the post project completion period.*

Exceptional: 10 pts	*Exceptional, measurable* improvement in water quality
High: 5 pts	*High quality* of measurable improvement
Medium: 3 pts	*Moderate, measurable* improvement
Minor: 1 pt	*Minor* improvement
No benefit: 0 pts	Improved water quality *not likely*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	*Potential minor negative impacts to water quality*
Medium detriment: -3 pts	*Moderate negative impacts to* water quality are likely

2e. Does the project increase ecosystem resiliency to climate change impacts?

Ecosystem resiliency to climate change means increasing the ecosystems ability to adapt to changes in climate or positively respond to the impacts of climate change. This includes: increasing streamflow during critical months, increasing natural storage (e.g., wetlands, upland meadows), decreasing water temperature during critical months, protecting or enhancing cold-water habitat, restoring floodplain connectivity and backwater habitats, restoring stream buffers, decreasing coastal erosion and inundation, or decreasing risk of drought, fire occurrence (not fire response), plant disease, or invasive species outbreak. This public benefit is centered on ecosystem resilience, not community resilience. Improvements to a community's resilience to climate change should be addressed in the social/cultural benefit category.

Exceptional: 10 pts	*Exceptional* improvements in multiple areas in ecosystem resiliency to climate change
High: 5 pts	*High* quality improvements in ecosystem resiliency to climate change
Medium: 3 pts	*Moderate* improvements
Minor: 1 pt	*Minor* improvements
No benefit: 0 pts	Improvements in ecosystem resiliency to climate change *not likely*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	*Minor decreases* in ecosystem resiliency to climate change may occur
Medium detriment: -3 pts	*Moderate decreases* in ecosystem resiliency to climate change are expected

2f. Does the project result in improvements that address one or more limiting ecological factors in the project watershed?

A limiting ecological factor is an environmental condition that limits the growth, abundance, or distribution of an organism or a population of organisms in the project watershed. Cite the limiting ecological factor(s) in your application and how the project may result in improvements.

Examples of limiting factors may include, but are not limited to, barriers to fish passage, lack of high quality habitat for sensitive, threatened and endangered species, low water quality, or low streamflow.

Application tip: *To score in this category an application must include citation of public reports, peer reviewed scientific studies, or other substantiating documentation from a state or federal agency to verify the limiting ecological factor's presence in the watershed.*

Exceptional: 10 pts	*Exceptional* progress towards removing limiting ecological factors or making improvements which address multiple limiting ecological factors
High: 5 pts	Important progress making improvements of a *high* quality which address limiting ecological factors
Medium: 3 pts	*Moderate* progress which address some limiting ecological factors
Minor: 1 pt	*Minor* progress which address some limiting ecological factors
No benefit: 0 pts	*Not likely* to address limiting ecological factors in the project watershed, *OR documentation verifying limiting ecological factor not included*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	*Potential minor worsening of some* limiting ecological factors in the project watershed
Medium detriment: -3 pts	*Exacerbates* limiting ecological factors in the project watershed

Category 3. Social or Cultural benefits

The evaluation of the social/cultural benefits of a project is based on the change in social or cultural conditions expected to result from the project as demonstrated in the application.

3a. Does the project promote public health, public safety, and local food systems?

This public benefit includes: protection of drinking water sources, repair of septic systems/field, maintenance and repair of other water infrastructure, treatment and protection of drinking water itself, improved emergency response and advisory systems (e.g., WARN network, fish consumption advisories, water contact advisories, etc.), improved or protected water quality for human consumption and human contact (e.g., removal or prevention of toxics, contaminants of concern, bacteria), and the promotion of self-reliant and resilient food networks that connect food producers and food consumers in the same geographic region.

Exceptional: 10 pts	*Exceptional* promotion of public health, public safety or local food systems vital to the community
High: 5 pts	*High* quality of promotion of public health, public safety or local food systems
Medium: 3 pts	*Moderate* promotion
Minor: 1 pt	*Minor* promotion of public health, public safety or local food systems
No benefit: 0 pts	Promotion of public health, public safety or local food systems *not likely*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential for *minor negative impact* to public health, public safety, or local food systems
Medium detriment: -3 pts	*Degrades* public health, public safety or local food systems

3b. Does the project result in measurable improvements in conditions for Oregon's environmental justice communities (e.g., minority or low-income communities, economically distressed rural communities, tribal communities, or other communities traditionally underrepresented in public processes)?

Environmental justice communities in Oregon are minority or low-income communities, economically distressed rural communities, tribal communities, or other communities traditionally underrepresented in public processes. Engagement could include outreach efforts to listen and involve environmental justice communities, solicit feedback on conditions in need of improvement, or communicate project description and anticipated outcomes.

Application tip: *Identify which of those communities would benefit from the project and quantify these benefits. Demonstrate that project-siting decisions have been examined and approved by affected landowners and affected environmental justice communities.*

Exceptional: 10 pts	*Exceptional* measurable improvements in conditions for environmental justice communities, and environmental justice communities were engaged in the process of developing projects
High: 5 pts	Improvements are of a *high* quality and environmental justice communities were consulted or provided meaningful opportunity to engage
Medium: 3 pts	*Moderate* improvements and environmental justice communities were provided meaningful opportunity to engage
Minor: 1 pt	*Minor* improvements
No benefit: 0 pts	Improved conditions *not likely*, *OR* benefit claims are *unsupported*

Minor detriment: -1 pt	Likely to result in *minor detriment* in conditions for environmental justice communities
Medium detriment: -3 pts	*Worse conditions* for environmental justice communities are likely

3c. Does the project promote recreation and scenic values?

Recreation and scenic values include recreational fishing, motorized boating, non-motorized boating, and other forms of water-based recreation, swimming, fishing, hunting, wildlife viewing, sightseeing, hiking, photography, and aesthetic values. To promote those values means the project would improve the quality of or access to the examples identified.

Application tip: *Evidence to support this benefit can be provided in the form of qualitative information, which may include interviews, professional opinion, or surveys.*

Exceptional: 10 pts	Exceptional promotion of recreation or scenic values, improving access and quality
High: 5 pts	*High quality of* promotion, improving access and quality
Medium: 3 pts	*Moderate* promotion, improving access or quality
Minor: 1 pt	*Minor* promotion
No benefit: 0 pts	Benefit to recreation and scenic values *not likely*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Potential to detract from recreation and scenic values (minor detraction)
Medium detriment: -3 pts	Moderate detractions from recreation and scenic values

3d. Does this project contribute to the body of scientific data publicly available in this state?

Contributing to the body of scientific data means collecting new scientific information *and* making it available to the public. For example, data could be collected from water quality or habitat monitoring; groundwater studies or other investigations; new stream gages; or new monitoring wells. Contributions could also come from conducting a Seasonally Varying Flow analysis. Collection of scientific data is not sufficient to achieve this public benefit---the data must be made publicly available.

Application tip: *Describe the equipment and/or methods that would be used and whether the data would be made available to the public. Note how this data supplies new information of particular significance to the project area.*

Exceptional: 10 pts	Exceptional contributions of new data to the body of scientific data publicly available in the state
High: 5 pts	High quality of data contributions
Medium: 3 pts	*Moderate* contributions
Minor: 1 pt	*Minor* contributions
No benefit: 0 pts	Contributions are unlikely or would occur regardless of the project, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Not applicable
Medium detriment: -3 pts	Not applicable

3e. Does this project promote state or local priorities, including but not limited to the restoration and protection of native fish species of cultural significance to Indian tribes?

A state or local priority is one that is identified in a plan, strategy, or study such as Oregon's Integrated Water Resources Strategy, a place-based integrated water resources plan, the Oregon Plan for Salmon and Watersheds, state and local water quality plans, species and habitat conservation or recovery plans/strategies, forestry plans, regional solutions priorities, local economic development plans, state or local hazard mitigation plans, etc. The Oregon Department of Fish and Wildlife maintains a list of native fish species: http://www.dfw.state.or.us/fish/crp/freshwater.asp.

Exceptional: 10 pts	Exceptional role supporting a state and local priority
High: 5 pts	*High* quality role in supporting a state or local priority
Medium: 3 pts	*Moderate* role
Minor: 1 pt	*Minor* role
No benefit: 0 pts	No promotion of state or local priorities, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	May be counter to state or local priorities
Medium detriment: -3 pts	Runs counter to state or local priorities

3f. Does this project promote collaborative basin planning efforts, including but not limited to efforts under Oregon's Integrated Water Resources Strategy?

Collaborative basin planning efforts incorporate public processes that are transparent and inclusive of diverse interests.

Application tip: *Demonstration of a collaborative planning effort may include publicly noticed meetings, posting agendas and decisions so they were publicly available, the inclusion of multiple types of water users represented in the process (e.g., instream interests, agricultural, municipal, domestic and industrial users), evidence that the project is supported by the community, and evidence that the project was identified in a Place-Based Integrated Water Resources Plan or another collaboratively developed strategic plan.*

Exceptional: 10 pts	Project was identified in a collaboratively developed plan that is supported by all basin interests and where the public had meaningful opportunities to engage
High: 5 pts	Project was identified by a collaborative group that includes representation of multiple interests, where the public had meaningful opportunities to provide input
Medium: 3 pts	The project promotes the goals of a collaborative basin planning effort
Minor: 1 pt	An effort was made to engage and elicit input from the public
No benefit: 0 pts	*No change/impact*, *OR* benefit claims are *unsupported*
Minor detriment: -1 pt	Stakeholders with differing perspectives and/or the public (as appropriate) were *not consulted* about the project and did not have opportunities to provide input
Medium detriment: -3 pts	Stakeholders with differing perspectives and/or the public (as appropriate) were *excluded* during project development

Preference Points and Total Points Available

For Water Project Grants and Loans and Irrigation Modernization Funding applications, a proposed project can receive up to 20 additional preference points. These points are not added to the public benefit category (economic, environmental, social/cultural) but are listed as "Other" in the evaluation summaries.

- For projects that propose to legally protect water instream, the score from question 2a will be doubled, for up to 10 additional points.

- For projects that include partnerships and collaboration, the score from question 3f will be doubled, for up to 10 additional points.

An application could score up to 60 points in each of the economic, environmental, and social/cultural public benefit categories. With the addition of the 20 preference points, there is a maximum public benefit score of 200 points.

For Irrigation Modernization Funding projects only, a project can receive an additional 10 preference points. These points are not added to the public benefit category (economic, environmental, social/cultural) but are listed as "Other" in the evaluation summaries.

- For projects involving surface water rights where the project conserves water, projects that legally protect a portion of the conserved water instream commensurate with the amount required under the approach described in ORS 537.470 will receive an additional 10 points.

With the addition of the 10 preference points, there is a maximum benefit score of 210 points for Irrigation Modernization projects.

Water Project Grants and Loans

	Minimum Score Required	Possible Points
Economic Public Benefits	5	60
Environmental Public Benefits	5	60
Social/Cultural Public Benefits	5	60
Preference Points	N/A	20
TOTAL	N/A	**200**

Irrigation Modernization Funding

	Minimum Score Required	Possible Points
Economic Public Benefits	5	60
Environmental Public Benefits	5	60
Social/Cultural Public Benefits	5	60
Preference Points	N/A	30
TOTAL	N/A	**210**

THE FRESHWATER TRUST®

The Freshwater Trust protects and restores freshwater ecosystems. Using science, technology and incentive-based solutions, we're changing the course of conservation on a timeline that matters.

May 9, 2025

Oregon Water Resources Department
Grant Analyst

Submitted via email to OWRD.Grants@water.oregon.gov

Re: OWRD Water Project Grants and Loans, Irrigation Modernization Funding, 2025 Funding Cycle 1 – Public Comment

To Whom it May Concern:

We appreciate the opportunity to submit comments on the Technical Review Team (TRT) funding recommendations for the first 2025 cycle of Irrigation Modernization Funding. The Freshwater Trust (TFT) is a nonprofit conservation organization committed to accelerating the pace and scale of conservation through the design and implementation of data-driven, science-based, performance-based solutions. TFT has a track record using insight-driven approaches to help design, develop and deploy watershed-scale solutions, including irrigation modernization, to some of the nation's biggest water challenges (see video). We bring our extensive experience—and challenges—applying for, managing, and reporting on various grants to bear in submitting the following comments.

We appreciate the efforts of the current Irrigation Modernization Funding applicants and believe the four projects recommended for funding will provide valuable public benefit. TFT's comments focus on the low number of applications despite the great need for irrigation modernization projects that provide economic, environmental, and social/cultural benefits. A more expansive approach to implementing the eligibility criteria would allow a greater number of applicants to join the program, and increase the public benefits these funds, including the $4.4 million available for the second 2025 funding cycle, would provide.

HB 5030 (2023 Ore. Laws 599, Section 10) provides that grants may be issued for irrigation modernization projects that: "[l]everage federal funding associated with Natural Resources Conservation Service authorized watershed plans, U.S. Bureau of Reclamation WaterSMART grant recipients or U.S. Environmental Protection Agency grant recipients that are eligible to be on DEQ's Intended Use Plan [(ODEQ IUP)]." In implementing the program, two overly narrow interpretations of these match provisions were made, which likely suppressed applications.

First, by only considering NRCS watershed plans under the PL-566 program—and not other watershed plans sponsored by NRCS, including National Water Quality Initiative or state-approved Conservation Implementation Strategy (CIS) areas—OWRD foreclosed applications for modernization dollars going to field-scale modernization projects that could be co-funded by NRCS through EQIP. District-scale modernization is important but is more powerful if paired with farm-scale modernization.

Second, the bill limits the use of EPA funds to grant recipients who are eligible to be on the ODEQ IUP for the Clean Water State Revolving Fund (CWSRF). This is overly restrictive and eliminates an entire category of important modernization projects even if they have secured leveraged funding for this purpose from the listed federal agencies. For example, non-profit organizations like ours are not eligible borrowers for the Oregon Clean Water State Revolving Fund, and so we were precluded from applying.

TFT is currently working with NRCS (including in an NRCS Water Smart Initiative [WSI] priority area), EPA, Idaho Power Company, the Treasure Valley 319 program, and multiple irrigators and irrigation districts to help modernize on-farm irrigation practices in the Snake River Basin. We have secured EPA grant funds to support on-farm modernization work in the Snake, and are working directly with NRCS (under contract) to leverage EPA and IPC dollars to those projects. But the match criteria, as interpreted, facially excluded us from applying for the Irrigation Modernization Funding. This seems like an outcome that is inconsistent with the intent of the bill, especially considering the low application volume received.

The Freshwater Trust encourages the Commission to consider a more expansive interpretation of the match thresholds. Specifically, we recommend that: 1) OWRD accept other NRCS watershed plans (e.g., CIS, NWQI, WSI) so that EQIP funding can be used as matching funds; and 2) that NGOs be allowed to partner with other eligible entities in applications for on-farm irrigation modernization funding (for either WaterSmart or EPA grant funds) if those *projects* are eligible under the respective WaterSmart and CWSRF programs and grant funds have been secured.

The Freshwater Trust appreciates your consideration of these comments.

Sincerely,

Timothy Wigington
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The Freshwater Trust
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