

To: Neal Coenen

Date: June 29, 2001

From: Stephanie Hallock

Subject: Evaluation of DEQ's Oregon Plan Measures and Workplan

Attached is DEQ's Annual Oregon Plan Measures report. We will also be sending this to you in electronic format. In addition, this memo captures DEQ's evaluative thoughts and suggestions related to the current state of Oregon Plan activities, per your request.

DEQ has spent some time reflecting on the current status of our Oregon Plan efforts, as well as where we would like to see things go in the future. This has resulted in two outcomes: (1) a decision to revisit and revise DEQ's Oregon Plan measures/workplan over the next several months, and (2) recommendations aimed at forging a stronger Oregon Plan "institution" within state government.

We look forward to working with you and the other Oregon Plan partners to take these exciting next steps in the continuing evolution and implementation of the Oregon Plan. If you have questions or would like to discuss our recommendations, please contact Karen Tarnow, who is coordinating this effort for DEQ.

Revisiting DEQ's Oregon Plan Measures/Workplan

Not unlike many other Oregon Plan stakeholders, DEQ suffers from a lack of clarity about what the Oregon Plan is and what it means for the agency. In large part, this can be attributed to DEQ's regulatory responsibilities and their inseparability with Oregon Plan goals. DEQ's Clean Water Act responsibilities are built upon the requirement to protect "beneficial uses" of Oregon's waters, such as swimming, drinking, aquatic habitat, etc. This includes ensuring that the water quality needs for salmonid species are met.

To ensure that water quality standards are met, DEQ:

- defines beneficial uses of Oregon's waterbodies
- develops water quality standards that protect beneficial uses
- monitors water quality
- assesses the health of aquatic organisms and communities, and identifies environmental stressors impacting them
- develops TMDLs and facilitates implementation of water quality management plans to restore water quality in waterbodies where standards are not being met

- issues wastewater permits that limit the amount of pollution that can be discharged into surface and ground waters
- issues water quality certifications to ensure that federally licensed and permitted projects do not violate water quality standards
- provides grants for nonpoint source pollution control projects
- provides low interest loans for the construction of sewage treatment plants and other publicly-owned water quality improvement projects

The focus and schedule for most of DEQ's water quality efforts are dictated by Federal Clean Water Act requirements and a court-approved schedule that requires DEQ to complete 91 subbasin TMDLs by 2007. These directives leave DEQ with little discretion about how to prioritize its resources.

Fortunately, the outcomes of these activities are perfectly aligned with Oregon Plan goals. In fact, the development and implementation of TMDLs are likely some of the most targeted and specific salmon recovery efforts currently underway. Clearly, DEQ is a keystone agency in the Oregon Plan effort, in spite of the fact that it would be doing most of the same things even if the Oregon Plan did not exist.¹

Perhaps this is true for the other Oregon Plan agencies, or perhaps not. For DEQ, this situation creates some confusion about our role in the Oregon Plan (given that the Clean Water Act is the real driver). This being the case, it behooves DEQ to conduct a review of our agency measures and workplan over the next several months. This activity could fulfill a variety of objectives:

- Create an opportunity to rethink what the Oregon Plan means to DEQ and what DEQ means to the Oregon Plan.
- Revise DEQ's Oregon Plan measures and reporting format to make it a more meaningful exercise to DEQ and for the Oregon Plan.
- Make better use of reporting requirements and outreach opportunities to better serve both DEQ and the Oregon Plan and to better inform the public.
- Identify opportunities to "leverage" the Oregon Plan activities of other state agencies and other stakeholders to advance our Clean Water Act agenda. For example, if we see how the activities/initiatives of other agencies support our goals, we may commit to supporting those efforts more fully (and vice versa).

The outcome would be a more meaningful and targeted Oregon Plan workplan that has greater agency buy-in. We anticipate that this exercise will be of value to DEQ as well as the Oregon Plan. We should be prepared to present our revised measures and workplan to you in the fall of 2001.

¹ Of course, we also realize that the existence of the Oregon Plan benefits our interests, as it leverages more resources toward water quality improvements and raises the assurance that implementation will occur.



Recommendations for “Institutionalizing” the Oregon Plan

The following recommendations are aimed at the overall Oregon Plan infrastructure:

- Develop 5-10 “high level” goals that more clearly define the focus and intent of the Oregon Plan. These may cover topics such as interagency coordination, recovery objectives, stewardship, etc. This framework could give the Oregon Plan the definition it lacks, as well as provide the targets that agencies (and others) should aim for.
- Have agencies review their measures, reassess their priorities re: salmon recovery, and revise their measures/workplans accordingly. Also, have them identify key “complementary efforts”, i.e., the activities of others (agencies, stakeholders, etc.) that are critical to them accomplishing their objectives. These revised workplans could be reviewed by the Core Team to see how it all measures up as a Recovery Plan. How well do things align? What’s missing? What else needs to be addressed?
- Oregon Plan reporting needs to be focused on providing meaningful information about accomplishments, trends or other indicators of our progress (or lack thereof). This needs to be kept in mind as we revisit/revise our measures – and may also suggest a rethinking about the way we do reporting.
- Question: How many different kinds of performance measures/indicators/benchmarks related to natural resource management can you name?
Answer: TOO MANY!!!
Oregon Plan Measures, Oregon Benchmarks, State of the Environment Indicators, agency performance measures, etc. Some of them may be flawed in concept – they lack meaning or cannot be measured due to lack of resources or measurement tools. Some are redundant. Others present conflicting expectations for agencies. These indicators need to be reduced in number and increased in value. While some of this work could be accomplished by the Oregon Plan agencies acting on their own, the “highest and best” outcome will likely require the leadership of the Governor’s Office.
- The mission and membership of the Core and Implementation Teams need to be clarified. As of late, the agendas seem to be filled with a lot of information transfer and “issues of the day.” This serves a purpose; however, it seems that there are other important functions for these groups that might be lost due to lack of focus. The Teams should rethink their purpose so that the best use is made of their time.

Attachment: DEQ’s Annual Oregon Plan Measures Report