

MEMORANDUM

To: Donna Beverage, Union County Commissioner; Convener, Upper Grande Ronde River Watershed (UGRRW) Partnership

From: Penny Arentsen, Natural Resource Specialist, Anderson Perry & Associates, Inc. (AP)

Subject: UGRRW Partnership's Future Group Governance Options Evaluation Summary

Date: June 6, 2024

Job/File No. 694-108-002

cc: Dana Kurtz, AP

Executive Summary

The UGRRW Partnership (Partnership) is examining options for future group governance. This Governance Options Evaluation Summary Memorandum (Memo) reviews multiple governance structure options for the Partnership, including keeping the current structure with the same or new convener (or co-conveners), or forming a non-profit, conservation alliance, water control district, special district, or an Oregon Revised Statutes (ORS) 190 entity. Each option is outlined below with a summary of the benefits and challenges examined and a possible path forward proposed.

Introduction

This Memo has been prepared for the Partnership and addresses the American Rescue Plan Act (ARPA), Coronavirus State Fiscal Recovery Fund UGRRW Partnership Place-Based Planning Task 1.4: Future Group Governance of the Partnership with the goal of examining options, benefits, and procedures to implement new group governance in the form of a variety of proposed long-term governing structures. This task is listed in the Partnership's Plan and is included as a recommended action in Strategy 6 (Infrastructure/Land Modification).

Background

The Partnership was formed in 2016 with the goal to use place-based planning to develop water resource management strategies to better align water resource demands in the UGRRW with available supply. Union County, Oregon, has been the convener of the Partnership since 2016 and is seeking to explore new options to lead all or parts of the State-Recognized Integrated Water Resources Plan (Plan) and understand whether other governance structures may be more beneficial in terms of capacity and technical resources to implement priority projects and strategies.

The planning area is the UGRRW, located in Union County, Oregon. Its boundaries closely align with the Union County boundary. The UGRRW is part of the larger Grande Ronde River Subbasin in northeast Oregon. The UGRRW is a vital ecosystem that supports ranchers, farmers, and urban residents, as well as an array of fish and wildlife species. While there is a significant body of research on water quality, quantity, and ecological demands in the UGRRW, there is a lack of seasonal-level analysis to evaluate

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whether the demands are aligned with available water quality and quantity. The Partnership was created to evaluate periods when the water quality and quantity demands in the UGRRW exceed the available resource.

The Partnership has followed the Oregon Water Resources Department's (OWRD) 5-step planning process to quantify and qualify water resource demands and availability in the UGRRW. The Partnership has met monthly from 2016 to 2021 and has concluded Step 5, which represents the conclusion of the 5-step process and provides a Plan that serves as a roadmap for the implementation phase.

Methods

The following governance structure options were developed by AP by first understanding the current structure, goals, and current and future projects of the Partnership. This information was gained during Partnership meetings and by reviewing the following Partnership documents:

- *Upper Grande Ronde River Watershed Partnership Place-Based Integrated Water Resources Planning Governance Agreement, Version 4.0, February 2017*
- *Upper Grande Ronde River Watershed Partnership Place-Based Integrated Water Resources Plan, January 2022*
- *Upper Grande Ronde River Watershed Partnership Place-Based Integrated Water Resources Planning: Plan Implementation Update, November 2023*

AP then reviewed the structure of a few other partnerships and organizations in the Pacific Northwest, like the Wallowa Basin Implementation Team (WBIT), Farmers Conservation Alliance, and the Wallowa Union Railroad Authority (WURA). An online review was also performed to research how the structure of each entity is set up and organized. Additionally, AP interviewed members of WURA and WBIT to ask for specific information about their organizations. Those interviewed were Susan Roberts, co-chair of WURA, Nils Christoffersen, Executive Director of Wallowa Resources (member of WBIT), Ian Wilson, Wallowa County Project Coordinator for the Grande Ronde Model Watershed (convener of WBIT), and Jeff Yanke, Grande Ronde Watershed District Manager for Oregon Department of Fish and Wildlife (member of the Wallowa Lake Dam Project). Additionally, AP contacted Coby Menton at the Oregon Watershed Enhancement Board (OWEB) for his feedback on the different convening entities and structures being proposed. His feedback is included where applicable in each governance structure option. AP also reached out to J.R. Cook with the Northeast Oregon Water Association via both phone and email. As of the timing of this Memo, AP is still awaiting a reply from Mr. Cook. The Memo will be updated once a reply is received. In this Memo, AP summarizes the benefits, challenges, and possible path forward for each structure and presents a conclusion with recommendations.

Funding

To date, the Partnership has relied on a range of grant funding from the OWRD, OWEB, ARPA, the Ford Family Foundation, and various granting organizations for the overall planning effort and also for specific studies. Some funding is allocated for capacity, facilitation, and convening, and is anticipated to be needed in the future as convening costs are currently covered by County match time. The new convener/structure of the group would need to be prepared to seek and secure grant funding opportunities for the Partnership's projects.

Influences to Consider for Future Governance Structure

Optimal structures for future governance are influenced by several factors:

Partnership Goals

The overall goals of the Partnership are:

1. Create a framework of communication, decision-making, and UGRRW-wide improvements for the basin's water resources.
2. Develop and publish a final integrated strategy for sustainable management of water resources.
3. Improve sustainable management of water supplies in the UGRRW and water resources for all users (ecological, municipal, agricultural, and others).

Strategy and Project Types

During the Step 4 planning process, the Partnership identified nine strategies to be implemented into the future. The first five strategies are currently being implemented. Current projects associated with these strategies are:

1. Aboveground Storage Feasibility Study - This study is nearing completion. More than 200 potential sites were analyzed and four are in the final stages of preliminary analysis for flow and other technical concerns. If desired, the Partnership will next pursue funding for a more detailed design of a selected site.
2. Catherine Creek Aquifer Storage Feasibility Phase II Investigation - The Partnership has initiated stakeholder and agency outreach and is developing a sampling and analysis plan to further understand whether aquifer storage is a viable option for supplementing late season surface water flows.
3. Instream Flow Study on the Grande Ronde River - This study is approximately halfway complete and will fill critical data gaps by generating important information about flow requirements for Endangered Species Act-listed fish species in a variety of life stages in this important river in the UGRRW.
4. Floodplain Restoration Fieldtrip - In April 2023, the Partnership visited three floodplain restoration sites, including McCoy Meadows, Longley Meadows, and Bird Track Springs, to learn how these restoration efforts have benefited the environment and how floodplains can provide groundwater storage benefits.
5. Strategic Action Plan - A working group has developed a draft Oregon Watershed Enhancement Board Strategic Action Plan to improve habitat in the lower valley through a voluntary, locally led levee setback/conservation easement program.
6. Hydraulic Model Support - The Partnership has supported the Union Soil and Water Conservation District (SWCD) and the Bureau of Reclamation on expanding an existing hydraulic model of the UGRRW to increase understanding of where catastrophic flooding risks are greatest, and what opportunities for improvement for flow and floodplain attenuation exist in the UGRRW.

7. Flow Gauge Reinstallation - The Partnership is working with the Confederated Tribes of the Umatilla Indian Reservation to reinstate a flow gauge in Lookingglass Creek that will provide important monitoring support for restoration projects.
8. Well Testing Education - The Partnership is developing a flyer to share with county residents to inform them of the City of La Grande's water testing results and how county residents can gain assistance with testing their private well water.
9. Quarterly Implementation Meetings - The Partnership continues to meet quarterly to collaborate progress as strategies are moved forward to improve water quality and quantity in the UGRRW.

Future Governance Evaluation

The following is an evaluation of each governance structure option, including entity type, mission, role, possible benefits and challenges of the structure, and a possible path forward.

Union County - Current Convener

Under this option, the County would continue convening the Partnership through implementation.

Type of Entity: Local government

Mission Statement: The County's local government is the guiding organization for the county's public services.

Role with Partnership: The County's Commissioner Donna Beverage has been the convener of the Partnership since its inception in 2016.

Benefits: The County has successfully led the Partnership through the first five steps over seven years. The County serves as an unbiased convener on water issues and has also served as the fiscal agent and administrator for grants.

Another example of a government entity overseeing a project is the Wallowa Lake Dam Rehabilitation Project (WLDRP). This project funding and structure came through state legislation and the Oregon Water Resources Department, which named the convener (the Governor of Oregon's office), as well as the members: the Wallowa Lake Irrigation District, Oregon Department of Fish and Wildlife (ODFW), the Nez Perce Tribe, and the Confederated Tribes of the Umatilla Indian Reservation (Yanke, 2024). A memorandum of agreement (MOA) between these parties forms the official structure (ODFW, 2024).

Challenges: The County does not currently have the technical resources to implement several of the Plan's strategies. The County could continue hiring consultants to manage studies and plans; however, the County would likely need to find a stronger partner to build and manage parts of the Plan (such as an aquifer storage recovery facility or a levee setback incentive program).

Potential Path Forward: The County could continue as the convener of the overall Partnership and seek a "lead implementation organization," such as the Union SWCD discussed below. Coby Menton provided feedback, noting the County runs the Partnership well with the support of AP

(from OWEB's vantage point) (Menton, 2023). He added that moving forward, this structure could successfully support implementation of the Plan.

Union Soil and Water Conservation District (SWCD)

Under this option, the Union SWCD would be the lead implementation organization.

Type of Entity: The Union SWCD is a form of local government ruled under ORS 568.210-890 and ORS 568.900-933, which govern state agencies and special districts. The Union SWCD is one of 45 conservation districts in Oregon and is managed by the Oregon Department of Agriculture (ODA). The region represented by the Union SWCD generally overlaps with the boundaries of the UGRRW and is sectioned into three zones. A Board of Directors oversees the Union SWCD and is composed of one director from each zone and two at large directors.

Mission Statement: To "assist and educate interested landowners in the development, protection, and conservation of natural resources." The Union SWCD's values are defined as the following:

- Wise use of natural resources to balance agricultural production with conservation;
- Local people making local decisions to achieve conservation;
- Voluntary initiatives over regulatory mandates;
- Efficient and effective use of public resources;
- Projects are partnerships in which everyone contributes, everyone benefits.

Each of the SWCDs in Oregon provides for the conservation of the state's renewable resources. They work with local landowners and residents, natural resource users, natural resource organizations, and local, state, and federal governments to help meet a range of natural resource conservation needs across the state. SWCDs seek to conserve natural resources, conserve and develop water resources and water quality, control and prevent soil erosion, preserve wildlife, conserve natural aesthetics, and promote collaborative conservation efforts to enhance and protect healthy watershed functions (ODA, 2023).

Role with Partnership: Founding member of the Partnership

Benefits: As an organization already involved with land and water conservation projects in the county, the Union SWCD has valuable working relationships with local constituents, including landowners. Additionally, the Union SWCD is familiar with a range of resource projects, from fish and wildlife resource projects to water resource projects. The Union SWCD can also assist landowners as a local sponsor for OWEB small grants. Some of the services the Union SWCD can provide include technical support and limited administrative oversight.

Challenges: The Union SWCD may not have the current capacity to take on this new role and may need to consider hiring new staff and/or obtaining funding.

Potential Path Forward: If the Union SWCD is interested in taking on the lead implementation organization role for the Partnership, the Partnership will discuss this role at a partner meeting. If the Union SWCD agrees to move forward with this role, a new governance agreement will be signed. Additionally, if the Union SWCD is best suited for the lead implementation role, then a

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co-convener structure with the County or another partnering entity will be discussed. If a new structure would need to be set up for co-convener (such as an ORS 190), then subsequent organizational steps would be followed. Coby Menton supported the idea of the County partnering with Union SWCD to become co-convener. However, he raised the question of whether a SWCD can enter into an ORS 190 agreement (Menton, 2023).

Grande Ronde Model Watershed

Under this option, the Grande Ronde Model Watershed (GRMW) would be the lead implementation organization.

Type of Entity: The GRMW is a 501(c)(3) non-profit, founded in 1992 and based in La Grande, Oregon. The GRMW is the current convener of the WBIT, a partnership in northeast Oregon working on water resource issues in the lower Grande Ronde River watershed region.

Mission Statement: The GRMW is “committed to restoring fish habitat on both public and private lands within the Grande Ronde Basin” (GRMW, 2023).

Role with Partnership: The GRMW is a founding member of the Partnership.

Benefits: The GRMW is familiar with water resource issues in the UGRRW as they are already involved with water resource projects, including modeling within the Grande Ronde Basin. They have many partners within the region they work with on water conservation projects and, as a non-profit, they are familiar with and have relationships with a range of funding sources. Additionally, they are familiar with managing grant funds. As the convener for the WBIT, the GRMW has governing documents for their board, which are part of the project review and approval process for the WBIT (Wilson, 2024). Given their role with the WBIT, the GRMW is familiar with projects in the lower Grande Ronde River watershed, which can be seen as a benefit to the Partnership. **Challenges:** The GRMW is a fish conservation focused organization. As the convener, they may be viewed as limited in focus.

Potential Path Forward: If the GRMW is interested in the lead implementation role for the Partnership, the Partnership will discuss the role at a partner meeting. Depending on the outcome of that meeting, a new governance agreement would be signed and if a new structure would need to be set up for co-conveners (like an ORS 190), then subsequent organizational steps would be followed.

Union County Natural Resources Conservation Service

Under this option, the Union County Natural Resources Conservation Service (NRCS) would be the lead implementation organization.

Type of Entity: The NRCS is an agency of the U.S. Department of Agriculture. The NRCS staff provide technical assistance and administer NRCS financial assistance conservation programs.

Mission Statement: The NRCS delivers conservation solutions so agricultural producers can protect natural resources and feed our growing world (NRCS, 2023).

Role with Partnership: The NRCS is a founding member of the Partnership.

Benefits: As a current member of the Partnership, the NRCS is familiar with and vested in the interest of the Partnership. Additionally, the NRCS hosts a “Local Work Group” that meets annually with local farmers, landowners, conservation partners, and other members of the

community to discuss the natural resource needs for the county. The NRCS seems to have already developed a good working relationship with many local landowners.

Challenges: It is uncertain whether the NRCS has the staffing capacity to convene the group. Additionally, they could be limited in their ability to seek grant funding being a governmental agency. Also, the NRCS may be more comfortable being a technical resource versus the lead for the Plan. Additionally, Coby Menton stated that as a federal agency, the NRCS is ineligible to seek grant funding from OWEB (Menton, 2023).

Potential Path Forward: If the NRCS is interested in the role of lead implementation organization for the Partnership, the Partnership will discuss the role at a partner meeting. Depending on the outcome of that meeting, a new governance agreement would be signed and if a new structure would need to be set up for co-conveners (like an ORS 190), then subsequent organizational steps would be followed.

Oregon Revised Statutes 190

This option would involve a new structure and a new convener.

Type of Entity: An ORS 190 is an intergovernmental entity created by an intergovernmental agreement (IGA) between two or more public agencies. Public agencies include the following entities (as defined in ORS 190):

- Units of local government (ORS 190.003)
- Public agencies (ORS 190.410)
- State agencies (ORS 190.480)

A governing board would be created, led by two organization leads (Oregon, 2023).

According to the Oregon Procurement Manual, an ORS 190 is set up for the following types of agreements (that apply to the Partnership):

- Interagency Agreements among agencies of Oregon state government
- Intergovernmental Agreements among public agencies of Oregon state

According to the Oregon Procurement Manual, a public agency can enter into an ORS 190 agreement with another state agency or with one or more public agencies in Oregon. The agreement's purpose is to have joint or cooperative action in carrying out the agency's authority, powers, and privileges (Oregon, 2023). As of 2018, there were over 60 IGAs in Oregon, including utility services, social services, and governmental collaboration (Oregon Solutions, 2023).

Mission Statement: An ORS 190 agreement would seek to foster efficiency and economy by promoting the use of existing resources.

Role with Partnership: New

Benefits: An ORS 190 structure would utilize existing government/agency positions, composed of a board led by two county commissioners (if the agreement is between two counties) or leaders of agencies. An ORS 190 can hire staff and apply for grant funding. This structure takes

advantage of structural/technical capacity at each of the partner organizations/agencies (Roberts, 2023).

Challenges: If technical/staffing capacity at each of the lead agencies does not exist, then capacity would need to be built. Staff (like an executive director/general manager) would be hired to implement/oversee the Plan. It is unclear if the Union SWCD can enter into an ORS 190 agreement.

Potential Path Forward: The Partnership would discuss options at a partner meeting. There are many considerations when determining if an ORS 190 agreement is the best path forward. A good resource is the document *A Practical Guide to Intergovernmental Entities in Oregon: Creating and Managing an Intergovernmental Entity Under ORS 190.010(5)* produced by the National Policy Consensus Center, Portland State University (Portland State University, 2023). Based on the outcome of the Partnership's decision, the subsequent discussion about which entities would co-convene would be held. Would the County remain as a co-convenor? Could a partnership be explored with the Union SWCD or NRCS? An ORS 190 would not support a co-convenor partnership with the GRMW since it is not a public agency. Should an ORS 190 intergovernmental/interagency agreement be selected as the path forward by the Partnership, the Oregon Secretary of State (SOS) office is a good place to start for steps to set up the agreement.

Water Control District (Oregon Revised Statutes 553) or Water Improvement District (Oregon Revised Statutes 552)

This option would involve a new structure and a new convenor.

Type of Entity: A water control district is a type of special district in Oregon. According to ORS 553.020, water control districts can be created for the purpose of:

- 1) ... acquiring, purchasing, constructing, improving, operating, and maintaining drainage, irrigation, and flood and surface water control works to prevent damage and destruction of life and property by floods, to improve the agricultural and other uses of land, and to improve the public health, welfare and safety.
- 2) A water control district, organized for one or more of the purposes provided by subsection (1) of this section, may also acquire, purchase, construct, improve, operate and maintain works and facilities for the secondary purposes of domestic, municipal and industrial water, recreation, wildlife, fish life and water quality enhancement. However, a water control district may not be created solely for one or more of the purposes provided by this subsection (Oregon Laws, 2023a).

One other type of district to consider is a water improvement district (ORS 552.108). This type of district acts very much like a water control district, in that it can be created for:

- 1) ...the purpose of acquiring, purchasing, constructing, improving, operating, and maintaining drainage, irrigation, and flood and surface water control works in order to prevent damage and destruction to life and property by floods, to improve the agricultural and other uses of lands and waters, to improve the public health, welfare

and safety, to provide domestic or municipal and industrial water supply, to provide water-related recreation and for the purpose of enhancing water pollution control, water quality, and fish and wildlife resources (Oregon Laws, 2023b).

The underlined wording is the portion that is different from a water control district.

Mission Statement: (see Type of Entity above)

Role with Partnership: New

Benefits: Multiple water control districts exist in Oregon. The Partnership could follow a model of another district to establish a new water control district. Funding would come primarily from the County tax base. The collection of funds from the County tax base could supply a constant, stable annual budget the Partnership could rely on. These funds could support a general manager/executive director for the district.

Challenges: The ORS 553.020 does not mention groundwater control. The Partnership would need confirmation if groundwater can be included in the scope of the district. The Partnership would need to consider whether the establishment of a new district would decrease the amount of revenue other existing districts would receive, based on the limitations of the total amount of revenue collected from property taxes (per the permanent rate limitation in Union County). If so, successfully passing a ballot measure to establish and fund a district could be difficult.

Potential Path Forward: At a partner meeting, the Partnership would discuss the idea of setting up either a water control or water improvement district. If the Partnership decides to move forward with either one, a successful ballot measure would be needed to establish the district.

Non-Profit

This option would involve a new structure and a new convener.

Type of Entity: An organization that has tax-exempt status with the Internal Revenue Service (IRS) and is organized for purposes other than generating profit. The organization cannot have a profit at the end of the fiscal year. There are multiple designations of “non-profit.” The Partnership would need to decide on which type of non-profit they would qualify as. Below are two designations that appear to be a possible fit for the Partnership:

- The 501(c)(3) designation is for the purposes of: religious, charitable, scientific, literary, testing for public safety, educational, to foster national or international sports competition, or prevention of cruelty to children or animals. Donations are tax-deductible (IRS, 2023).
 - An example of a 501(c)(3) non-profit in Oregon is Farmers Conservation Alliance, Hood River, Oregon (social enterprise non-profit) (Christoffersen, 2023)
 - Mission: We work to keep the water flowing for farms, food, and fish.
 - Farmers Conservation Alliance works towards water management solutions in rural communities that benefit both agriculture and the environment. Their Irrigation Modernization Program works with irrigation districts to upgrade their infrastructure.

- A social enterprise non-profit is a mission-driven organization catering to social causes from profits earned from a commercial venture (Farmers Conservation Alliance, 2023).
- The 501(c)(5) designation is for labor, agricultural, and horticultural organizations. Donations are not tax deductible. Agricultural organizations must work towards bettering the conditions of those engaged in agriculture and developing a higher level of efficiency in agriculture (IRS, 2023).
 - An example of an existing 501(c)(5) organization is the Oregon Farm Bureau (OFB), Salem, Oregon.
 - Mission: “We give a voice to farm and ranch families at the Capitol, in the courts, and within regulatory agencies.”
 - The OFB is a grassroots, nonpartisan, non-profit organization representing more than 6,600 member families involved in more than 250 agricultural commodities (OFB, 2023).

For more information about how a 501(c)(5) agricultural organization is developed and run with the IRS, visit this webpage: <https://www.irs.gov/charities-non-profits/other-non-profits/life-cycle-of-an-agricultural-or-horticultural-organization>.

- Another non-profit tax status to consider is 501(c)(12) for activities of a mutual or cooperative nature (like ditch or irrigation companies).

Mission Statement: A 501(c)(5) agricultural non-profit's purpose is to improve the conditions of agricultural work and to improve efficiency.

The current mission statement for the Partnership is as follows: “Through this Partnership, we will work collaboratively to determine basin-wide water supply, analyze basin-wide water demands, and develop an Integrated Water Resources Strategy (Integrated Strategy) to improve the sustainable management of water supplies in the Watershed for all users in the future” (UGRRW, 2017).

Role with Partnership: New

Benefits: This new structure could offer an unbiased view of the Partnership’s work. Each of the partner organizations could be “members.” The non-profit status would help the Partnership be eligible for a large range of funding opportunities.

Challenges: While the IRS guidelines mention aquatic resources within the 501(c)(5) scope, more research would be needed to ensure this designation is the correct one. A governing board would need to be created, and an executive director would need to be hired.

Potential Path Forward: The Partnership would discuss if the establishment of a non-profit would be the best path forward at a partner meeting. If so, the Partnership would need to follow steps outlined by the Oregon Department of Justice (DOJ) for establishing a non-profit. A few initial considerations include:

- Hire a nonprofit lawyer to help guide the Partnership through the process and make sure all aspects are correct legally.

- Consider options for the name of the organization, decide if the organization will have members (people with the right to vote on certain matters relating to the organization’s operations), decide on board officers, and designate the registered agent.
- Prepare and file Articles of Incorporation with the SOS.
- Obtain an employer identification number from the IRS.
- Develop bylaws.
- Apply for tax-exempt status with the IRS.
- Register with the DOJ (The Nonprofit Association of Oregon, 2023).

Conclusion

This Memo presents multiple future governance options for the Partnership. A summary of each option and associated benefits and challenges are provided below.

Entity Type	Benefits	Challenges
Union County	Already convenes the Partnership	Needs support for future implementation
Union SWCD	Understands water resource issues in the UGRRW	Potential capacity limitations
GRMW	Understands water resource issues in the UGRRW	Limited in focus to aquatic restoration
NRCS	Understands natural resource issues in the UGRRW	Potential capacity limitations
ORS 190	Provides structure for co-conveners	Requires a new structure and building an organization
Water Control/Improvement District	Provides structure and funding for implementation	Creation requires a ballot measure and funds would come from additional property tax
Non-profit	Provides structure and fundraising capacity	Requires a new structure and building an organization

A range of options are possible, from maintaining the current structure with the County continuing as the convener, to one of the other Partnership members being designated as the new convener or co-convener, or an entirely new entity being created, such as a non-profit or an ORS 190 organization. While it was not AP’s intent to list options in any order, such as the easiest to the most involved option, it seems the last three options for creating new entities would be the most involved and require the greatest initial effort by the Partnership to accomplish. It is AP’s intent for this information to provide guidance to the Partnership in their decision-making process.

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References

Christoffersen, Nils. Executive Director, Willowa Resources. Personal Communication with Penny Arentsen on December 1, 2023.

Farmers Conservation Alliance. 2023. Farmers Conservation Alliance: Who We are. Available at: <https://fcasolutions.org/about/>. Accessed on November 30, 2023.

Grande Ronde Model Watershed (GRMW). 2023. GRMW website. Available at: <https://www.grmw.org/>. Accessed on November 30, 2023.

Internal Revenue Service. 2023. Publication 557 (01/2023), Tax Exempt Status for your Organization. Available at: https://www.irs.gov/publications/p557#en_US_202201_publink10002273. Accessed November 30, 2023.

Menton, Coby. Oregon Watershed Enhancement Board, Region 5 Program Representative. Personal Communication with Penny Arentsen on December 19, 2023.

Natural Resource Conservation Service (NRCS). 2023. NRCS website. Available at: <https://www.nrcs.usda.gov/conservation-basics/conservation-by-state/oregon/union-county>. Accessed on November 30, 2023.

Oregon, State of. 2023. Oregon Revised Statutes (ORS) 190 Agreement. Available at: <https://www.oregon.gov/das/opm/pages/ors190.aspx>. Accessed November 30, 2023.

Oregon Department of Agriculture. 2023. About SWCDs. Available at: <https://www.oregon.gov/oda/programs/naturalresources/swcd/pages/swcd.aspx>. Accessed November 29, 2023.

Oregon Department of Fish and Wildlife (ODFW). 2024. Memorandum of Agreement for the Willowa Lake Dam Rehabilitation Project. Available at: https://www.dfw.state.or.us/fish/local_fisheries/wallowa/docs/20200622%20Wallowa%20Lake%20Dam%20MOA_signed_CTUIR.NezPerce.ODFW.WLID.pdf. Accessed on January 23, 2024.

Oregon Farm Bureau. 2023. About Oregon Farm Bureau. Available at: <https://www.oregonfb.org/ofb>. Accessed November 30, 2023.

Oregon Laws. 2023a. Creation of Water Control Districts. Available at: https://oregon.public.law/statutes/ors_553.020. Accessed November 29, 2023.

Oregon Laws. 2023b. Creation of Water Improvement Districts. Available at: https://oregon.public.law/statutes/ors_553.020. Accessed December 14, 2023.

Oregon Solutions. 2023. Oregon Intergovernmental Agencies (ORS 190). Available at: <https://orsolutions.org/wp-content/uploads/2018/11/WFLC-Oregon-IGAs-08-29-18.pdf>. Accessed December 13, 2023.

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Portland State University. 2023. A Practical Guide to Intergovernmental Entities in Oregon: Creating and Managing an Intergovernmental Entity Under ORS 190.010(5). Available at https://www.pdx.edu/policy-consensus-center/sites/policyconsensuscenter.web.wdt.pdx.edu/files/2020-09/NPCC_Gov_Guide_Final_9-16-20.pdf. Accessed on December 13, 2023.

Roberts, Susan. Wallowa County Commissioner and Co-Chair, Wallowa Union Railroad Authority. Personal Communication with Penny Arentsen on November 30, 2023, and December 7, 2023.

The Nonprofit Association of Oregon. 2023. How to Start a Nonprofit in Oregon. Available at https://nonprofitoregon.org/sites/default/files/uploads/file/How%20to%20Start%20a%20Nonprofit%20in%20Oregon-NAO_0.pdf. Accessed on December 14, 2023.

Upper Grande Ronde River Watershed Partnership. 2017. Upper Grande Ronde River Watershed Partnership Place-Based Integrated Water Resources Planning Governance Agreement, Version 4.0, February 2017.

Wilson, Ian. Wallowa County Project Coordinator, Grande Ronde Model Watershed. Personal Communication with Penny Arentsen on January 23, 2024.

Yanke, Jeff. Grande Ronde Watershed District Manager, Oregon Department of Fish and Wildlife. Personal Communication with Penny Arentsen on January 23, 2024.

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