



BAKER COUNTY SOIL AND WATER CONSERVATION DISTRICTS

Baker Valley • Burnt River • Eagle Valley • Keating

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February 1, 2024

Oregon Watershed Enhancement Board
Small Grant Rules Advisory Committee
775 Summer St. NE
Salem, OR 97301

RE: Draft Language in Small Grant Rule 695-035-0050

The Baker County Soil and Water Conservation Districts, consisting of Baker Valley, Burnt River, Keating and Eagle Valley Board of Directors, are submitting this joint letter in opposition to proposed language in OWEB's Small Grant Rule 695-035-0050. The draft language, regarding Eligible Small Grant Projects, reads:

“(g) Water Quantity and Quality/Irrigation Efficiency: In addition to the Project Completion Report requirements found in 695-035-0040(10)(g)(C), the report shall include demonstration that an application to the Oregon Water Resources Department for lease, transfer, or the Allocation of Conserved Water program has been submitted that dedicates the saved water, or a portion of the saved water, for instream purposes.”

All four Baker County SWCD Boards strongly feel that OWEB's Small Grant Program is not the appropriate venue to implement this additional level of state department involvement. The Small Grant Program is successful because it is streamlined, accessible to all property owners and follows basic eligibility requirements; a 10 page OWRD application, not to mention the associated fees, in addition to OWEB's current Project Completion Report requirements will seriously overburden the Program. Small Grant Rule 695-035-0050 already requires that irrigation efficiency projects receive a local watermaster technical review and approval as a condition prior to funding; and the installation of a flow meter is typically required as a special condition under all irrigation efficiency projects. No other eligible project types under OWEB's Small Grant Program are subject to the same level of review or monitoring. Furthermore, the Allocation of Conserved Water Program is completely voluntary, as stated on OWRD's website; requiring application to a voluntary program is counterproductive to say the least.

Within the draft language the Small Grant Rules Advisory Committee (RAC) made a note that reads: “Watershed benefits are associated irrigation efficiency projects that address water quality, however the technical review required to demonstrate these benefits is beyond the scope of the Small Grant



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Program. It is highly encouraged that applicants with these project types apply to other OWEB grant programs.”

If the RAC feels as though the technical review required to demonstrate irrigation efficiency and water quality benefits is beyond the scope of the Small Grant Program, it seems contradictory to then mandate an extensive water use application, one that would require thorough technical review by multiple state agencies, under the same Small Grant Program. It is clear that eligibility rules are being tweaked to discourage irrigation efficiency applicants; however the Small Grant Program has been, and continues to be fundamental for irrigation efficiency improvements on smaller acreage properties in Baker County, and across the state.

The Program is crucial for first-time and family-owned farms; folks who are getting started, working under conservative budgets, or whose proposals may not compete with large-scale irrigation projects that are seeking hundreds of thousands of dollars. Small grants are designed to be implemented on a smaller scale, with a smaller budget, and within a shorter time frame. In the past two years alone, the Baker County SWCDs have worked with private landowners to implement 22 small grants, ten of which were irrigation efficiency related projects, converting 451 acres of previously flood irrigated ground to a more efficient sprinkler irrigation method. Oregon DEQ’s Powder Basin Strategic Report and Action Plan (SRAP) aims to look more comprehensively at water-related issues, and provides practices for stakeholders to implement that will lead to improved water quality; converting from flood to sprinkler irrigation is one of the practices the SRAP specifically lists. This approach should extend to OWEB’s Small Grant Program, not only to provide continuity between state programs, but to allow landowners and districts to continue to make significant impacts to water quality, water quantity, and irrigation efficiency across the state.

On Behalf of the Baker Valley, Burnt River, Keating and Eagle Valley SWCD Board of Directors,

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