



Oregon

Kate Brown, Governor

Department of Agriculture

635 Capitol St NE
Salem, OR 97301-2532



October 5, 2018

Doug Krahmer, Chair
Oregon Agricultural Heritage Commission
775 Summer Street N.E. #360
Salem, Oregon 97301

Subject: Comments on OAHP Proposed Administrative Rules

Dear Chair Krahmer:

The State Board of Agriculture (the Board) greatly appreciated the opportunity to hear from you and your fellow Oregon Agricultural Heritage Commission (the Commission) members last week in North Bend regarding the proposed rules to implement the Oregon Agricultural Heritage Program (OAHP) established by HB 3249. The Board recognizes and appreciates the need for the OAHP; as much of Oregon's agricultural lands will be changing hands over the next several decades as farmers and ranchers retire – with many of these land owners not having any succession plans. Protecting threatened working lands across the Oregon landscape is important for current and future generations.

The Board strongly believes the OAHP's main focus should be on working lands. While we believe implementing conservation management plans and improvements to soil health, water quality and fish and wildlife habitat are important objectives, the integration of conservation values with the protection of agricultural lands as working lands is critical to the OAHP success.

Equally important to the primary focus of the OAHP is acceptance by farmers and ranchers in all parts of the State. Because most Oregon farmers and ranchers have little experience in the use of easements today, ensuring that information about the program is disseminated in a form that is accessible and understandable will be critical in developing the trust needed in an easement program involving working lands. The Board recognizes that rules inherently can be lengthy documents however simplifying the rules, where possible, and ensuring the materials and forms available to producers are simple and easily filled-out is vital to building that trust.

Additionally, the Board was extremely interested in how the Commission and the Oregon Watershed Enhancement Board (OWEB) would use regional review teams to analyze and evaluate issues related to "regional significance" and other agricultural criteria. The Oregon Department of Agriculture (ODA) has expertise and connections to the agriculture community in all regions of the State. We strongly encourage and recommend that OWEB and the Commission utilize that expertise in the development of any regional review teams.

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Likewise, the Board requests OWEB work with ODA staff on several outstanding definitional questions we have.

In closing, the Board would like to thank you for extending the comment period to accommodate our meeting schedule. We appreciate the long, hard and timely work that the Commission, OWEB and staff have put into the development of these draft rules. We strongly support the OAHP and were excited to learn about OWEB's requested funding through the Agency recommended budget process. We look forward to working with you and other stakeholders to support adequate, long-term funding of the program.

Thank you again for the opportunity to comment on the proposed rules and we look forward to working together to protect Oregon's working landscape.

Sincerely,

A handwritten signature in black ink that reads "Tyson Raymond". The signature is written in a cursive style with a horizontal line above the first name.

Tyson Raymond, Chair
State Board of Agriculture

CC:

Meta Loftsgaarden, Executive Director, OWEB
Randy Labbe, Co-Chair OWEB Board
Will Neuhauser, Co-Chair, OWEB Board
Bruce Taylor, Vice-Chair, Oregon Agricultural Heritage Commission
Alexis M. Taylor, Director, Oregon Department of Agriculture