Oregon Watershed Enhancement Board
Submitted Written Public Comments
October 22-23, 2024

Item C, J : Public Comment

Name	Topic
Gary Young, Blue Mtn. Ranch	Comments relating to water protection, enhancement, regeneration, and resilience
Karsyn Kendrick, COLT	Comments relating to OWEB's Strategic Plan, COLT updates and lobbying activities
Randy Wiest, High Desert Partnership	Agenda Item K. In support of High Desert Partnership's (HDP) Oregon Rangeland Monitoring Project
Tyler Goss, High Desert Partnership	Agenda Item K. In support of High Desert Partnership's (HDP) Oregon Rangeland Monitoring Project
Melissa Petschauer, High Desert Partnership	Agenda Item K. Follow up comments relating to High Desert Partnership's (HDP) Oregon Rangeland Monitoring Project application
Vanessa Schroeder, Eastern Oregon Agricultural Research Center	Agenda Item K. In support of High Desert Partnership's (HDP) Oregon Rangeland Monitoring Project
Jacqueline Cupples, USFWS	Agenda Item K. In support of High Desert Partnership's (HDP) Oregon Rangeland Monitoring Project
Bruce Loranger, BLM	Agenda Item K. In support of High Desert Partnership's (HDP) Oregon Rangeland Monitoring Project
Cheryl Horton, MidCoast WC	Agenda Item P. Comments relating to the Focused Investment Partnerships (FIP) Rulemaking

From: oregon-gov-web-services@egov.com
To: BETTINARDI Nicole * OWEB
Cc: REPPLINGER Linda * OWEB
Subject: Public Comment
Date: Friday, July 26, 2024 9:51:30 AM

First and Last Name	Gary Young
Phone Number	
Email Address	gyoung@bluemtnranch.com
I wish to provide (select one):	written comment
If you are providing VERBAL comment, how do you plan to attend the meeting (select one):	
I want to provide comment at (select one):	Other (please provide more information in the comment section below)
Agenda Topic / Item Letter	Water Protection, Enhancement, Regeneration, Resilience
	Start by acknowledging no real difference between “ground water” and “surface water”. The sooner we do the better off we will be. If they are not connected then the water table is too low and raising should be the goal. The unconfined aquifer is the water table. The water table is the instream flow. The only pathway to permanently protecting water in any watershed is by maximally recharging the aquifers and preventing development over recharging areas prioritizing the top of he watershed. The only real Water Bank is the unconfined aquifer which is the water table/streamflow. Aquifer recharge puts water into storage and cannot be over-appropriated because as the water table rises springs and gravity will determine appropriate storage level. Need to enlarge, enhance and protect from development natural storage and recharge areas(floodplains, forest, wetlands, snowpack), prioritizing the top of each watershed. Maximally recharging our aquifers is the most efficient and effective

Type Comment Here (comments may also be uploaded below):	way to improve/maintain ecological health, nourishing microbes(bacteria,fungi) and plant life, photosynthesis soil building and carbon storage, preventing desertification. The water table of the unconfined aquifer is the measurement for instream flow. To increase instream flow, raise the water table The top of each watershed should always be the highest priority to saturate the unconfined aquifer which is the water table/streamflow. Need to balance Instream Water Rights with effort to create the most healthy functioning landscape possible, focusing on recharging excessive drainage during spring thaw and other high/destructive flow events. Maximally recharging our aquifers and putting water into storage as high in the watershed as possible during high/destructive flow events is the most natural, efficient and effective way to protect minimum flows(ISWRs) with springs of colder perineal water The extremes of climate change that could be cushioned with a large body of water store in fully recharged aquifers throughout the watershed The most “beneficial use” of water is progressing towards maximally recharging our aquifers, nourishing microbes(bacteria,fungi) and plant life, photosynthesis soil building and carbon storage, preventing desertification. John Wesley Powell suggested all political boundaries should be based on watersheds. I believe we need policies and rules that encourage aquifer recharge and large natural filtration basins/floodplains in any available area, beginning at and prioritizing the higher elevations of our watersheds, leaving the maximum opportunities for more retention at each successively lower level.i Gravity and erosion will tend toward rapid and concentrated drainage of watersheds. Thankfully beaver and buffalo helped brake this process until they were considered more valuable skinned. Hooved grazing animals, constantly moving, herd trained by predators or otherwise, leave in their wake a lightly tilled and manured stubble, not excessively harvested, ideal for enhancing grass production and cover. Man-made means for spreading, retention and recharge are merely modern extension of the beaver’s eco-knowledge. Artificial waterway channelization, for various purposes of convenience, has been way overdone. Compared to the 19th century, we have very little healthy functioning floodplain where waterways are constantly changing course, spreading and slowing the water, recharging our aquifers. I believe we need policies and rules that tend against rapid channelization and encourage the slowing and spreading of early spring thaw, as high in watersheds as possible. We can no longer depend on or expect a slow melt off of winter snow pack. The concept of "carry water" (water saved, or supposedly “not lost”, using piping and other more efficient water management) has been discussed. This concept suggests this water should be considered “new” water subject to appropriation and/or conveyance for lower elevation uses. In my opinion, this idea short-sightedly ignores the benefits to all levels of eco-systems that accrue by effecting maximum aquifer recharge at each watershed elevation. When water is allowed to saturate soils and replenish aquifers while slowly traveling to lower elevations it has the potential to address and improve -desertification, -depleting water tables, -wells going deeper or dry, -subsidence with

	resulting infrastructure damage, -encroachment of salt water into fresh water, -warm streams that should have cold spring-fed water mixing -aquatic life disruption, -intermittent streams that should be perennial, -the extremes of climate change that could be cushioned by more ground and surface storage, -nourishing of microbes and plant life, -photosynthesis soil building -carbon sequestration and storage, -rapid drainage and soil erosion Encouraging water users and water use decision makers to preserve priority water use at each natural level is a more purposeful and productive determination of efficient water management than whatever the cause, motive, legal pretext, or covering language is intended by "carry water". Check out the water-concerns page on our website https://www.bluemtnranch.com/water-concerns Book recommendation: “Call of the Reed Warbler” by Charles Massy Is it too late to regenerate the earth? Call of the Reed Warbler shows the way forward for the future of our food supply, our Australian landscape and our planet. This ground-breaking book will change the way we think of, farm and grow food. Author and radical farmer Charles Massy explores transformative and regenerative agriculture and the vital connection between our soil and our health. It is a story of how a grassroots revolution – a true underground insurgency – can save the planet, help turn climate change around, and build healthy people and healthy communities, pivoting significantly on our relationship with growing and consuming food. Using his personal experience as a touchstone – from an unknowing, chemical-using farmer with dead soils to a radical ecologist farmer carefully regenerating a 2000-hectare property to a state of natural health – Massy tells the real story behind industrial agriculture and the global profit-obsessed corporations driving it. He shows – through evocative stories – how innovative farmers are finding a new way and interweaves his own local landscape, its seasons and biological richness. At stake is not only a revolution in human health and our communities but the very survival of the planet. For farmer, backyard gardener, food buyer, health worker, policy maker and public leader alike, Call of the Reed Warbler offers a tangible path forward for the future of our food supply, our Australian landscape and our earth. It comprises a powerful and moving paean of hope. Gary Young Box 13 Paulina, Oregon 97751 541-279-7572
Request physical, language, or other accommodations	

Submission ID: f1beeabd-67a5-42e7-9143-2bb2475cbf91

Record ID:

COALITION OF OREGON LAND TRUSTS
2540 NE MLK JR BLVD, PORTLAND, OR 97212 • 503-719-4732 • OREGONLANDTRUSTS.ORG

October 17th, 2024

Oregon Watershed Enhancement Board
775 Summer Street NE
Salem, OR 97301

Co-Chairs Coates, Boyer, and Members of the Board,

On behalf of the Coalition of Oregon Land Trusts (COLT), thank you for the opportunity to provide written comment for the October OWEB Board Meeting. COLT is a nonprofit membership organization that serves and strengthens the land trust community in Oregon by building connections and advancing policies that help protect our natural world.

We represent 31 member organizations including land trusts, soil and water conservation districts, and conservation organizations working to protect clean water, fish, and wildlife habitat across the state – for all people, forever.

Today, we would like to provide comments and updates on the Strategic Plan Update, the Oregon Agricultural Heritage Program, our 2025 Policy Platform, and our new Executive Director!

COLT Welcomes Joe Buttafuoco as Executive Director!
COLT is thrilled to announce that after an extensive search process, our Board of Directors have officially hired Joe Buttafuoco to lead our coalition as the Executive Director! Joe comes to COLT after 14 years at the Nature Conservancy, ending his tenure as the Associate Director of Stewardship.

Joe brings over 20 years of experience in land conservation to his role with COLT, caring for conservation lands and managing stewardship programs and teams in Oregon and New York. He has years of experience connecting people to nature and building community around our shared role as stewards of natural places. Joe is committed to the ongoing work of the Oregon Land Justice Project and efforts to build relationships in service of Indigenous peoples and their efforts to reclaim lands and culture.

Joe officially begins his role at COLT later this month and will work to connect with COLT's memberships and partners in the coming months, including the Board members and staff at OWEB. We look forward to Joe's leadership for our Coalition and ask that OWEB board and staff join us in giving him a heartfelt welcome to his new role with the COLT community!

Strategic Plan Update

During the April Board Meeting, COLT provided written and verbal testimony respectfully requesting the Board include protection as an outright goal within the Strategic Plan Refresh and embed land protection in each objective, strategy, activity, and outcome. This plan will set the north start for OWEB's work for the next five years, guiding OWEB in delivering its mission to "protect and restore healthy watersheds and natural habitats that support thriving communities and strong economies."

We were glad to see the most recent Strategic Plan Update included in the Board materials incorporates watershed *protection* in tandem with restoration throughout the priorities and strategies. As the only agency with a dedicated land acquisition grant program in Oregon, it is vital that OWEB champion the impacts land and water protection have on supporting healthy watersheds, thriving communities, and strong economies.

Advocacy Updates

Oregon Agricultural Heritage Program

As we prepare for the 2025 Oregon legislative session, we would like to share the work completed so far this year around advocacy and education for the Oregon Agricultural Heritage Program. Over the summer I worked closely with Nellie McAdams, Executive Director of the Oregon Agricultural Trust (OAT), to meet with legislators and plan legislative tours focused on working lands protection and opportunities through OAHP. Between June and August, we met with over 40 Oregon legislators to talk about the importance of funding OAHP in the 2025 legislative session.

We also hosted three legislative tours in September. Our first tour featured Creswell Oaks, a

1,610-acre ranch property in Lane County that contains hundreds of acres of oak woodlands and hosts the valley's largest population of Oregon Vesper Sparrows. We hosted a virtual tour of Carman Ranch in Wallowa County, where participants heard from rancher Cory Carman about how she hopes to use the OAHP to protect her land and improve her business viability. Finally, we brought legislators and agency staff to Washington County to hear about Adelante Mujeres's Regenerative Agriculture program and their work to improve farmland access. We would like to thank the OWEB staff that participated in each of these legislative tours and the program expertise they provided to our attendees. Thank you!

During September legislative days, we worked with Representatives Helm and Owens to submit our legislative concept to fund OAHP during the 2025 legislative session. We are asking for $17.3 million for the biennium, funding that includes $14.5 million for OAHP conservation easements, $1 million for the other grant programs through OAHP, and 12% for OWEB administrative needs. Earlier this year, COLT circulated a survey that found robust demand for OAHP easements in the 2025-2027 grant cycle. Specifically, we found a pipeline of at least 25 easement projects that would protect close to 40,000 acres of land in Oregon and need $14.5 million of state investment. We will continue to work closely with our legislative champions, conservation partners, and coalition members to advocate for this funding as the 2025 legislative session begins.

2025 COLT Policy Platform

Each year, our Coalition crafts a policy platform that is guided by our strategic objectives to 1) increase public funding for acquisitions, stewardship, and operations through new and existing sources, 2) advance and defend policies and programs that support our work, 3) educate lawmakers and agencies on land trust impacts and needs, and 4) help COLT members build active relationships with their elected officials.

Currently, we have a drafted version of our 2025 Policy Platform circulating for feedback and edits among the membership and will have a final version up for a vote at our Annual December Member Meeting. In addition to funding for the OAHP, we expect to track and advocate for the Drinking Water Source Protection Grant Program and OWEB staffing needs, permanent protections for recreational immunity on private lands, and other relevant conservation programs and legislation.

We would be happy to share the final version of our 2025 Policy Platform with this Board once it is final. Thank you for the time and opportunity to comment today.

In Partnership,

Karsyn Kendrick
Conservation Director
Coalition of Oregon Land Trusts

Oregon
Tina Kotek, Governor

Department of State Lands
951 SW Simpson Ave., Suite #104
Bend, OR 97702
(541) 388-6112
FAX (541) 388-6480
www.oregon.gov/dsl

Oregon Watershed Enhancement Board
775 Summer St NE #360
Salem OR 97301

Application Name: 224-5051-23619
Project Name: Oregon Rangeland Monitoring Project
Applicant: High Desert Partnership

Dear OWEB board,

This letter is to express our support for High Desert Partnership's application for monitoring grant funds to collect information about the effectiveness of rangeland restoration treatments under the Oregon Rangeland Monitoring Program (ORMP). The Oregon Department of State Lands (DSL) works closely with High Desert Partnership to implement actions and monitor the Southeast Oregon Wildfire Resilience (SOWR) Project. ORMP has become especially important given the extremely large investments in restoration across southeastern Oregon, resulting in many tens of thousands of treatment acres across public and private lands. Without a practical and cost-efficient monitoring protocol, many of these treatments would receive no monitoring at all, leaving practitioners to guess about the efficacy of the methods and how to adaptively manage treatments over time. Given the unprecedented investment in rangeland restoration from both state and federal agencies, it is imperative to document successes, and lessons learned.

DSL actively collaborates with HDP to implement projects beneficial to DSL and surrounding lands to reduce wildfire risk. The detailed data collected using ORMP is important for documenting the status and trends of state trust rangeland SOWR projects BIL funded projects and complements existing range monitoring the department implements. DSL will plan on partnering with HDP to collect additional ORMP data to continually improve our understanding of the most effective rangeland restoration techniques.

Again, we encourage OWEB to fund HDP's effectiveness monitoring grant and are confident it will result in useful and actionable information to guide rangeland management in Oregon and beyond.
Sincerely,

Randy Wiest
Bend Field Office
Real Property Program
Department of State Lands

Harney Soil & Water Conservation District
PO Box 848
530 Hwy 20 South, Hines, OR 97738
Phone: 541.573.6446
Email: goss@harneyswcd.net

Oregon Rangeland Monitoring Project

Public Comment

I am writing on the behalf of the High Desert Partnership's (HDP) Oregon Rangeland Monitoring Project. The Harney Cooperative Weed Management Area (CWMA) is a big supporter of HDP's working efforts to monitor projects to see the successes and failures of the projects we implement as a collaborative group. HDP has been working on these monitoring points for the last few years, collecting great data for the private/public lands in Harney County. I would like to use this data for future projects in the county to determine what is the best method to control annual grasses. With the help of the HDP Southeastern Oregon Wildfire Resiliently project, Harney CWMA was able to spray 13,000 acres of Rejuvra on private ground. This monitoring program will ensure that result of this project's data will be captured. Private landowners will use this data to manage their lands efficiently. These are only a few of the reasons that this funding pool is important to the Harney CWMA and the future of annual grass control in the county.

Sincerely,
Tyler Goss
Harney CWMA

HIGH DESERT Partnership

Oregon Watershed Enhancement Board
775 Summer St NE #360
Salem OR 97301

Dear Board Members:

Thank you for the opportunity to provide public comment on the proposal we submitted to the Oregon Watershed Enhancement Board (OWEB) to support continued monitoring of a high priority restoration project, the Southeast Oregon Wildfire Resilience (SOWR) project. We appreciate the time that OWEB staff took to review our proposal and would like to address their identified concerns with our proposal.

As we detailed in our application, Oregon Senate Bill 762 (SB762) provided substantial funding ($8.8 million in 2022-2023) to support High Desert Partnership's SOWR project which resulted in restoration projects spanning approximately 105,000 acres on private and public land in Harney and Malheur counties. SB762 did not provide funds to monitor the outcomes of this major investment. Nonetheless, it is critical to understand if SOWR project efforts have been effective and what factors contributed to treatment success or failure in order to guide adaptive management. While we have collected pre-treatment and 1-year post treatment monitoring data with in-kind funding, long-term monitoring is key to determine if outcomes are durable and to compare different treatment methods. Funding for continued monitoring is also important to demonstrate the value of taxpayer investments provided through SB762 to restore rangelands and reduce wildfire risk and to share results with funders, decision-makers, and our project partners, including private landowners. We believe the monitoring work proposed in our application represents a high cost-benefit ratio given that our budget is 4% of the implementation costs of the overall SOWR project.

We address each of the reviewers comments in more detail below:

1. Reviewers expressed a desire to better understand the spatial context for the monitoring that has and will continue to occur for the SOWR project in relation to other habitat restoration projects that have and will be monitored using the Oregon Rangeland Monitoring Program (ORMP) framework. Please see Project Area Map included with our application which depicts where the SOWR project monitoring has occurred to date, as well as other ORMP-monitored projects in eastern Oregon. The SOWR project represents about one third of the area being monitored using ORMP.

The SOWR project can be considered a “large-scale” restoration project because within its boundary, individual treatment areas are often hundreds to thousands of acres in size and address ecological threats across ownership boundaries. These larger projects represent a new scale of restoration activities than funding has previously afforded. When taken together with other similar “large-scale” projects implemented throughout eastern Oregon, our monitoring may be able to detect a “landscape-scale effect” across the state’s rangelands. As more conservationists implement “large-scale” projects across the Great Basin, monitor using the same rapid ORMP approach, our U.S. Geological Survey (USGS) partners can combine data to assess “biome-scale” ecosystem effects.

2. Reviewers also were unclear if there would be an adequate sample size to determine if the amount and quality of sagebrush habitat is improving at the landscape scale and to determine the relative efficacy of different restoration approaches. To help clarify this comment, we would like to point reviewers to the manner in which we have defined “landscape-scale” above.

   In 2022 and 2023, 468 and 683 monitoring locations were assessed using ORMP, respectively. The plots were located in 275 unique treatment polygons (and control/untreated areas). Treatments began in 2019 and spanned a combined total of 250,719 acres in eastern Oregon. In 2024, the ORMP monitoring effort was scheduled to conduct plot assessments across 383 unique treatment polygons spanning 313,712 acres. These data provide a powerful sample size with which our USGS partners can determine which restoration approaches are successful and why. Sufficient monitoring points are placed across individual treatments to capture the ecological variability within individual polygons; this allows for evaluation of individual treatments based on factors like elevation, exposure to solar radiation, precipitation, etc. Furthermore, analyses can be conducted with groups of treatments with identical methods that span different geographies to understand how outcomes may vary across a wider gradient of the abiotic factors mentioned above.

   As monitoring occurs across “large-” and “landscape-scale” restoration areas, metrics are designed to readily convey two key factors that are synonymous with sagebrush habitat integrity: 1) ecological state describing general vegetation condition (using the widely-accepted Threat-based Land Management approach); and 2) resistance and resilience to ecological disturbance (conveyed by the ratio of desirable native bunchgrasses to invasive vegetation). Improvement in sagebrush habitat is also measured by comparing the percent cover of the target species of the treatment over time (e.g., increases in seeded species or decreases in invasive species treated with herbicide). These approaches have been specifically selected for the ease with which they can

communicate the quantity and quality of sage-grouse habitat at both “large-” and “landscape-scales”. For example, maps color coded to display ecostates is a widely-accepted and understood approach to understanding the degree of sagebrush habitat integrity in the state.

3. Reviewers expressed concern that our application did not describe how sage-grouse response to the restoration actions will be understood.

   The scope of the monitoring of the SOWR project does not include measuring sage-grouse response to habitat enhancements; rather the actions and objectives detailed in our application reflect our focus on measuring treatment efficacy for the purposes of guiding adaptive management, sharing lessons learned among practitioners, and communicating results with interested parties.

   That stated, the SOWR project is within sage-grouse habitat and if restoration efforts are successful, we would expect sage-grouse to respond positively. However, we are not proposing to measure sage-grouse response for several reasons, including:

   a. Our objective is to evaluate the response of the vegetation, not wildlife;

   b. Sage-grouse use of treatment areas is most accurately measured by tracking birds that have been captured and fitted with GPS transmitters. This is costly and requires expensive equipment, transmitter subscription fees, and personnel with wildlife handling and tracking expertise. Although we are not currently aware of any datasets, we can work with researchers and ODFW to overlay our project areas with any existing or future collected sage-grouse telemetry data to evaluate if any sage-grouse locations overlap with the SOWR project.

      Other habitat restoration efforts, such as those occurring in Baker County, are able to capitalize on ongoing research by Oregon State University (OSU) to monitor GPS-marked sage-grouse habitat use of areas that have undergone treatment. Results from the sage-grouse monitoring in Baker County can potentially be generalized to other areas, like the SOWR project.

   c. ODFW coordinates surveys of sage-grouse breeding sites (leks) every spring to generate an annual population estimate. The trend of leks within the area of the SOWR project could be used to evaluate how the local sage-grouse population responded to SOWR restoration efforts. However, sage-grouse population trends naturally oscillate through time and individual annual point estimates of the population may be influenced by many factors not related to the habitat restoration efforts (e.g., climate, predation, disease). Thus, this type of analysis is more

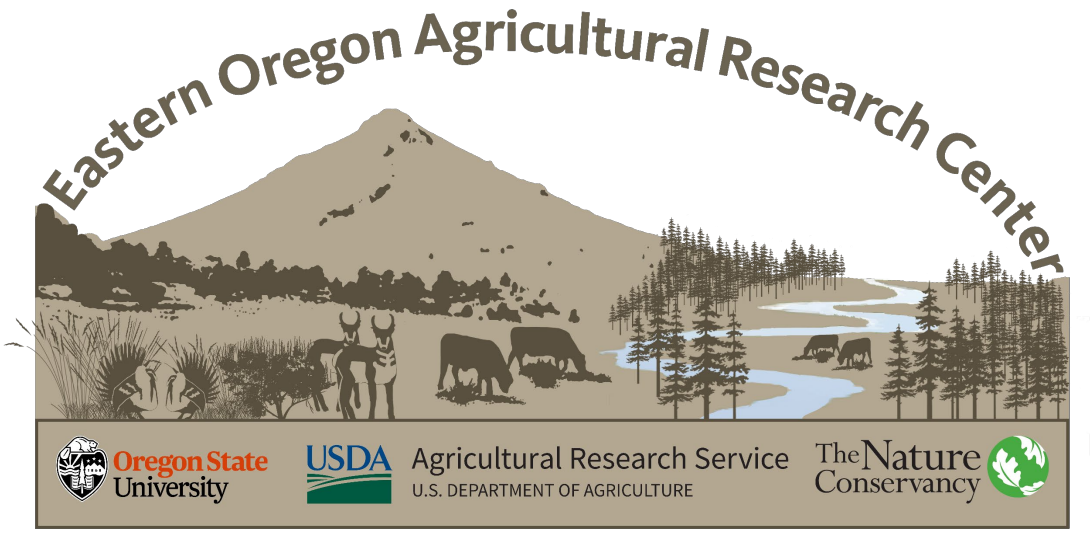
complex than it might appear, and would require expertise outside the scope of our proposal. USGS has been contracted to complete this type of analysis for the Baker County Focused Investment Partnership, and recent efforts to evaluate the effectiveness of conservation measures implemented to benefit sage-grouse in the Bi-State (Nevada-California) region provide a model for how to approach this analysis in the future (see Coates et al. 2024). With future funding, a similar analysis could possibly be conducted for the SOWR project.

4. Reviewers expressed interest in understanding how the project partners are engaging tribes as a technical expert or as a local community disproportionately impacted by climate change.

   As the lead applicant, High Desert Partnership is dedicated to bringing voices that are not often heard to the table. HDP strives to promote collaboration across communities of southeast OR and is engaged in protecting diversity, enacting equity, and fostering inclusion. We recognize this area as the ancestral home of the Wadatika band of the Neme, the Northern Paiute people, the indigenous past and present dwellers of this land, and the significance that conveys for native culture, spirituality, and heritage. Our partners, including our tribal partners are critical to successfully advancing collaborative processes and solutions to balance ecological, social, and economic values. The Burns Paiute Tribe (BPT) is a small tribe with 402 enrolled members of which 142 people call the Reservation in Harney County their home. They are also a "young" community with over 50% of the population under the age of 18. There are very few people with a lot of demands on their time. We do engage the BPT natural resource department and tribal members in our collaborative groups including the Harney County Wildfire Collaborative, the Harney County Restoration Collaborative and the Harney Basin Wetlands Collaborative. This is where we typically engage technical expertise including the projects that we are proposing monitoring. In addition, HDP works to bring added capacity to the very limited capacity of the Burns Paiute Tribe, this includes tribal youth participating in the Youth Collaborative internship program. The proposed project will take place in Harney and Malheur counties where most communities are considered "frontier rural" and as such are traditionally underserved. Rangelands in southeast Oregon cover most of the landscape and are typically underfunded while the health of the land is the foundation for vital communities including our native tribal community members.

5. Reviewers requested additional detail to better understand how expenses for lump sums were calculated. HDP will sub-contract with Institute for Natural Resources to add capacity to complete all the plots to be monitored.

   INR has previous expenses data for the prior two years of monitoring. We determined the costs associated with hiring and supervising a seasonal staff including salaries and payroll liabilities (including annual allocations of 0.1-0.3 FTE for program leadership; 0.2-0.3 FTE for monitoring coordination; and 0.7-2.8 FTE for crew leads and members), travel and mileage (averaging $3700/month), supplies and equipment (averaging $308/year) and divided that number by the total plots to be monitored annually and that came out to be $425/plot. This seemed like the best way to sub-contract with INR. HDP will also subcontract with USGS so that they can maintain a user dashboard to display the data; this is a flat rate of $15,000 that incorporates USGS personnel costs for three scientists (approximately a total of 250 hours at various rates) associated with developing and managing the dashboard.



The Eastern Oregon Agricultural Research Center supports High Desert Partnership's application, *Oregon Rangeland Monitoring Project # 000-0000-23619*. The proposed work described in the application helps address the following major needs identified in Schroeder et al., 2022:

- **Challenges in Scaling Science to Management**: Translating traditional plot scale scientific research into large-scale management is challenging due to differences in temporal and spatial conditions, often leading to unexpected and ineffective results. Land managers need information on treatment effectiveness at the management scale.
- **Collaboration Between Science and Management**: Effective management benefits from integrating the latest scientific research. There is a need for scientists and land managers to work closely in testing multiple treatments at management scales to address issues like invasive annual grass management. This collaboration can accelerate scientific breakthroughs and improve management success.
- **Need for Dynamic Management Tools**: To enhance adaptive management, there is a need for a comprehensive, user-friendly monitoring system that captures the variability and outcomes of treatments and yields information that better informs future treatment decisions at relevant scales.

The monitoring work being conducted by HDP is helping both science and management to understand the relationship between scale and management, directly promotes collaboration between science (USGS) and management, and provides a data-based platform to enable adaptive management in dynamic natural resources environments. The Oregon Rangeland Monitoring Program is currently the only organized regional effort focused on providing the monitoring necessary to empower these benefits, and provides such information in a timely manner that enables its use of in adaptive decision-making.

Schroeder, V. M., Johnson, D. D., O'Connor, R. C., Crouch, C. G., Dragt, W. J., Quicke, H. E., Silva, L. F., & Wood, D. J. (2022). Managing invasive annual grasses, annually: A case for more case studies. *Rangelands*, *44*(3), 210–217. https://doi.org/10.1016/j.rala.2022.01.002

United States Department of the Interior

FISH AND WILDLIFE SERVICE
La Grande Field Office
3502 Highway 30
La Grande, Oregon 97850
Phone: (541) 962-8584 FAX: (541) 962-8581

File Number: ADMI-670-2
File Name: OWEB Monitoring Grant - Public Comment – ORMP – USFWS
TS Number: 25-19

Oregon Watershed Enhancement Board
775 Summer St NE #360
Salem, OR 97301

Dear Oregon Watershed Enhancement Board:

Thank you for the opportunity to provide public comments on High Desert Partnership's (HDP) application for monitoring grant funds. The Service believes the monitoring proposed in HDP's application is critically urgent and represents a high cost-benefit ratio. Effectiveness monitoring of rangeland restoration efforts is essential to guide adaptive management in a timely manner and to plan future treatments, yet it is often overlooked or under-emphasized despite large financial investments by federal, state, local and private entities.

For example, in 2015, the Oregon Watershed Enhancement Board (OWEB) alone committed $10 million towards restoration of sagebrush habitat. Although OWEB requires project monitoring, grant recipients use a myriad of different methods and largely retain rather than widely share monitoring data, making it difficult, if not impossible, to draw lessons from the collective conservation efforts in Oregon. Similarly, Oregon Senate Bill 762 (SB762) provided substantial funding ($8.8 million in 2022-2023) to support HDP's Southeast Oregon Wildfire Resiliency (SOWR) project which resulted in restoration projects spanning approximately 105,000 acres on private and public land in Harney and Malheur counties. Yet, SB762 did not provide funds to monitor the outcomes of this major investment.

Each year, approximately 1.3 million acres of the most intact habitat across the sagebrush biome are lost as a result of invasive annual grasses, expanding conifers, and large wildfires (Sagebrush Conservation Design 2022). Yet, conservation efforts are significantly outpaced by current rates of habitat loss (Mozelewski et al. 2024). This means, collectively, practitioners must expedite the learning curve to ensure the right techniques are strategically applied to maximize restoration results. Continued monitoring of HDP's SOWR project helps to address a larger need to understand treatment results so the most promising strategies are employed, and importantly, that the techniques are matched appropriately to the existing vegetation and abiotic conditions where

they will be most successful. Bridging this information gap is critical to reverse the staggering rate of decline of intact sagebrush habitat.

HDP, in collaboration with Oregon State University's Institute for Natural Resources (INR), has been instrumental in initiating and utilizing the standardized methods of the Oregon Rangeland Monitoring Program (ORMP) to monitor the SOWR project. ORMP is a growing collaboration between the U.S. Fish and Wildlife Service (Service), eastern Oregon partners, U.S. Geological Survey (USGS), INR, and the SageCon Partnership. ORMP began with effectiveness monitoring of the Oregon Watershed Enhancement Board (OWEB) Focused Investment Partnership (FIP) funded projects in Baker County has since expanded to provide a monitoring framework for the SOWR project and additional Bureau of Land Management Inflation Reduction Act and Bipartisan Infrastructure-funded restoration projects throughout eastern Oregon.

Beyond supporting the monitoring of the SOWR restoration efforts, HDP's application responds to an identified need to harness practitioners' experience and outcomes of large-scale habitat restoration efforts to inform future restoration treatments and adaptive management of ongoing projects. This is because, ORMP standardizes data collection, management, and analyses. Instead of organizations using many different metrics, data collected across eastern Oregon use a common protocol and data are incorporated into a single database, thereby facilitating analyses of individual or groups of treatments across the state.

Because Oregon's treatment and monitoring data are incorporated into the USGS-managed Land Treatment Digital Library (LTDL) and Land Treatment Exploration Tool (LTET), HDP will be contributing to the limited, but important body of knowledge tracking implementation and effectiveness of landscape-scale restoration efforts across the sagebrush biome. The LTET will summarize treatment effectiveness and factors influencing restoration successes and failures, and make this information publicly available to practitioners range-wide through an web-based dashboard.

This information is also integrated into the Service's Conservation Efforts Database (CED). The CED's repository of conservation actions in the sagebrush ecosystem is a species status assessment tool, yet treatment effectiveness is lacking due to the inconsistency of monitoring efforts and reporting. HDP's monitoring using ORMP will provide treatment implementation and effectiveness data that are essential for assessing the extent to which stakeholders have increased the quantity and quality of sage-grouse habitat range-wide.

The Service strongly advocates for effectiveness documentation of recent large-scale restoration efforts, like the SOWR project, which taken together, may confer ecological uplift at landscape-scale throughout eastern Oregon. Effectiveness monitoring is needed for different audiences including: 1) practitioners to guide adaptive management in a timely manner and to plan future treatments; 2) funders to report the impact of restoration investments; and 3) decision-makers to

demonstrate progress towards regional goals and promote policies that prioritize rangeland restoration. Each of these are critical towards advancing the Service's goal of improving sagebrush ecosystems throughout eastern Oregon, and ultimately support the diverse wildlife dependent on healthy rangelands.

For all the above reasons, the Service encourages OWEB to fund HDP's effectiveness monitoring grant. Please feel free to contact me (marisa_meyer@fws.gov) or Jackie Cupples, Oregon Sagebrush Ecosystem Coordinator (jacqueline_cupples@fws.gov, 541-926-8593), if you have any questions or require further information. Thank you for considering our comments.

Sincerely,

Marisa Meyer
Field Supervisor

Literature cited:

Doherty, K.E, Theobald, D.M., Bradford, J.B., Wiechman, L.A., Bedrosian, G., Boyd, C.S., Cahill, M., Coates, P.S., Creutzburg, M.K., Crist, M.R., Finn, S.P., Kumar, A.V., Littlefield, C.E., Maestas, J.D., Prentice, K.L., Prochazka, B.G., Remington, T.E., Sparklin, W.D., Tull, J.C., Wurtzebach, Z., and Zeller, K.A., 2022. A sagebrush conservation design to proactively restore America's sagebrush biome: U.S. Geological Survey Open-File Report 2022–1081, https://doi.org/10.3133/ofr20221081.

Mozelewski, T.G., Freeman, P.T., Kumar, A.V., Naugle, D.E, Olimpi, E.M., Morford, S.L., Jeffries, M.I, Pilliod, D.S., Littlefield, C.E., McCord, S.E., Wiechman, L.A., Kachergis, E.J., and Doherty, K. E. 2024. Closing the conservation gap: Spatial targeting and coordination are needed for conservation to keep pace with sagebrush losses. Rangeland Ecology and Management 97:12-24.

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Burns District Office
28910 Hwy 20 West
Hines, Oregon 97738
www.blm.gov/office/burns-district-office

OCT 17 2024

Oregon Watershed Enhancement Board
775 Summer St NE #360
Salem, OR 97301

RE: Letter of Support for High Desert Partnership's Oregon Rangeland Monitoring Project
Application #000-0000-23619

Dear Oregon Watershed Enhancement Board Members,

We encourage the Board to invest in the Oregon Rangeland Monitoring Project which will benefit the future management of Oregon's public and private lands. In 2022-2023, Oregon Senate Bill 762 (SB 762) provided substantial funding ($8.8 million) to support restoration projects on private and public land in Harney and Malheur counties (~105K acres), known as the Southeast Oregon Wildfire Resiliency (SOWR) project. However, SB 762 did not provide funds to monitor the outcomes of this major investment. Monitoring of the SOWR project, and rangeland restoration efforts more broadly, is a significant need in eastern Oregon. The High Desert Partnership (HDP), in collaboration with U.S. Fish and Wildlife Service (USFWS), the Institute of Natural Resources and USGS has stepped in to fill the gap created by this monitoring need. They have ensured that a robust, yet practical monitoring protocol, known as the Oregon Rangeland Monitoring Program, would be used to inform adaptive management and future restoration treatments.

The Oregon Rangeland Monitoring Program (ORMP) is the first of its kind that seeks to coordinate and standardize monitoring of restoration projects throughout eastern Oregon across land ownerships. This year the Burns District BLM implemented ORMP protocols to monitor vegetation management projects. Improving the resilience of these landscapes is critical to the BLM mission and a key part of that work is understanding project outcomes. Funding the High Desert Partnership's application will support long-term monitoring with a diverse set of County, state, and federal partners. This type of cross-boundary monitoring is key not only to determining if treatment outcomes are durable and comparing different treatment methods but will also help project managers plan more successful projects and ensure decision-makers understand our return on restoration investments.

Please contact Calla Hagle, Burns District IRA Coordinator chagle@blm.gov or Sam Cisney, Burns District Weeds Specialist scisney@blm.gov if you have any questions.

Sincerely,

Bruce Loranger
Acting District Manager
Burns District
Bureau of Land Management

From: oregon-gov-web-services@egov.com
To: BETTINARDI Nicole * OWEB
Cc: REPPLINGER Linda * OWEB
Subject: Public Comment
Date: Wednesday, October 16, 2024 2:38:26 PM

First and Last Name	Cheryl Horton
Phone Number	
Email Address	cheryl@midcoastwc.org
I wish to provide (select one):	written comment
If you are providing VERBAL comment, how do you plan to attend the meeting (select one):	
I want to provide comment at (select one):	OWEB Board meeting (please include agenda item you wish to comment on below)
Agenda Topic / Item Letter	Item P - Focused Investment Partnerships (FIP) Rulemaking Update
Type Comment Here (comments may also be uploaded below):	As a FIP Coordinator in cohort 3, I respectfully ask the Board to reconsider changes to the match requirement being proposed by the FIP RAC. Currently, FIPs are expected to meet a 25% overall match requirement for their initiatives. The proposed change would require different amounts of match to be allocated on a grant by grant basis going forward. Making this change partway through cohort 2 and 3 FIP's means accounting for match one way for existing grants and a completely new way for all future grants under these FIPs. Shifting the goal posts partway through the game will waste time and resources for coordinators and partnerships that have already been accounting for match under the existing rules. If the Board is adamant that the match requirement must change, please consider doing so for cohort 4 FIP only, since these initiatives do not yet have grants in place and haven't started their accounting. Current requirements are already complex and time consuming to meet.

Request physical, language, or other accommodations	
Verification	I am not a robot

Submission Date: 10/16/2024 04:38 PM CST

Submission ID: f95b6a79-5bd9-44ad-b0bb-cbaaa02c7208

Record ID: