

Summary of Public Comments: OAHP Rules

Rule: 698-005-0045(1) Climate-Related Evaluation Criteria			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Recommends adding how local communities disproportionately impacted by climate change “are engaged in the project”, in addition to how they have informed or will inform the project.	The climate-related evaluation criteria added to the proposed OAHP rule revisions are identical to the climate-related evaluation criteria adopted by the OWEB Board in July 2023 for the OWEB grant program. These rules were developed and vetted with the assistance of a separate rulemaking advisory committee that intended the evaluation criteria to apply for both OWEB and OAHP grants. Grant applications have been evaluated with criteria beginning in the last year, and the rules will be evaluated for effectiveness within the next four years.	No

Rule: 698-005-0045(3) Climate-Related Evaluation Criteria			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Recommends changing language to read, “How the project is likely to result in a reduction of greenhouse gas emissions or long-term carbon sequestration or storage”.	See response to comment on 698-005-0045(1).	No

Rule: 698-010-0090(1) Evaluation Criteria			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Expressed concern that the phrase, “as measured by” implies a quantitative score will be developed for each criterion, rather than viewed holistically. Recommends more qualitative language.	OWEB agrees, and has changed the proposed rule language to, “The significance of the agricultural, natural resource, and related social values of the working land subject to the Conservation Management Plan(s), as measured by including: ”	Yes

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Rule: 698-010-0090(2) Evaluation Criteria			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Expressed a similar concern as noted in 698-010-0090(1) and recommended more qualitative alternative language.	The proposed existing language provides reviewers flexibility in evaluating how the implementation of Conservation Management Plans would protect, maintain, or enhance farming or ranching on working lands.	No

Rule: 698-010-0090(4) Evaluation Criteria			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Expressed concern that the proposed language is confusing and could be interpreted to read that a Conservation Management Plan would protect agriculture from other investments. Suggests modifying the language for clarity.	OWEB agrees, and has changed the proposed rule language to, “The extend to which the Conservation Management Plan would protect agricultural outcomes or benefits that have resulted from other related investments”.	Yes

Rule: 698-010-0090 Evaluation Criteria			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Requests adding an evaluation criterion related to engaging underserved populations, similar to the evaluation criterion found in 698-020-0060 for the Working Land Technical Assistance Grant Program.	OWEB acknowledges that engaging underserved populations is important, and notes that the Division 5 evaluation criteria related to engaging local communities disproportionately impacted by climate change will apply to this grant program as well. The Working Land Technical Assistance Grant Program described in Div. 20 rules has meaningful focus on engaging new partners, given the broader scope of that grant program and its intent to lead to	No

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		future OAHP easement and conservation management plan projects. The Div. 10 grant program is targeted at implementation of individual Conservation Management Plans.	
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Rule: 698-020-0010(2) Purpose			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Suggested clarifying language to make clear the intent of the Working Land Technical Assistance Grant Program.	OWEB agrees, and has changes the proposed rule language to, “The purpose of Technical Assistance Grants is to provide technical assistance grants to eligible entities included in 698-020-0030 to promote, encourage or support development of Conservation Management Plans, or acquisition of Working Land Conservation Covenants or Working Land Conservation Easements.”	Yes

Rule: 698-020-0070(2) Technical Review and Funding Process			
Commenter(s)	Comments	Response	Rule Change
Sophie Els & Megan Kemple, Oregon Climate and Agriculture Network	Noted that there is a reference to an incorrect administrative rule.	OWEB agrees, and has changed the proposed rule language to, “Applications shall be evaluated according to the criteria described in OAR 695-020- 0050 0060 and 695-005-0045.”	Yes