



June 3, 2024

Attention: OAHP Commission and Staff

RE: OAHP RULEMAKING

The Oregon Association of Conservation Districts represents the 45 Soil and Water Conservation Districts, Oregon local governments, in promoting conservation practices and providing technical services to rural and urban citizens in each county.

We promote conservation planning and projects that incorporate practices on natural and working lands that include, among other project, those that include carbon sequestration and carbon storage (www.OACDCarbon.org).

We appreciate the OAHP Commission and staff reviewing the existing rules for applications and implementation and concur with the majority of changes in the draft document.

OAR 698-005-0010

OACD endorses the changes in the purpose statement that support natural and working lands to maintain our natural resource land base and provide the opportunity for increased economic benefits.

OAR 698-005-0020

It is important to add the definitions of carbon sequestration and storage. The definitions provided by staff seem to fit well. Climate criteria definitions should also be added to encompass OWEB's new climate evaluation criteria in this section.

We support new subsection 9 addressing "durable adaptation and resilience for ecosystems" as a definition to respond to changing climate.

The limited description of "farming" as it appears in the land use statutes and incorporated in this section and in any other areas of OAR 698 should state "farming" but without the statutory reference which narrows the meaning for the purpose of this program as noted at new subsections 10 and 17.

Subsection 14 is a needed addition to incorporate the legislature's intent for including underserved populations.

We concur that existing subsection 12 better fits in Division 15 and should be moved there.

OAR 698-05-0030

The majority of this section should be moved to the application processing section.

OAR 698-050-0045

It is important to include the OWEB climate criteria in this section to align the program with other OWEB grants.

OAR 698-05-0060

We concur that the term “conservation management plan” no longer encompasses the broader provisions of the program and could be renamed to be more consistent.

OAR 698-10-0030

We support the change in language that inserts “not-for-profit organizations other than a state agency” to replace “tax exempt under 501(c)(3) of the internal revenue code” as other non-profits supporting this conservation work are excluded. The Natural and Working Lands Fund legislation enacted in 2023 does not have this limitation.

OAR 698-10-0040 through -0150

Changes proposed by staff in these sections to better accommodate applications that might be addressed as CMPs should be initiated to clarify and summarize those sections to make them more easily readable and to better fit the current statutory provisions of the program, including the new Natural and Working Lands Fund direction from the legislature.

Thank you for the opportunity to comment and we may have additional comments to share during the public comment period on June 5.

Sincerely,

Oregon Association of Conservation Districts

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