

Public Comment

Partnerships and Capacity Committee Meeting 6.09.26

First and Last Name	Jack Halsey
I wish to provide (select one):	written comment
Name of Committee (required)	OWEB Partnerships & Capacity Committee
Type Comment Here (comments may also be uploaded below):	<p>Thank you for the opportunity to provide input on the Council Capacity Grant rulemaking process. I strongly support the Council Capacity Grant Program and believe it is one of OWEB's most important investments. Capacity funding supports the staff, partnerships, and organizational systems that make watershed restoration possible. It helps watershed councils develop projects, engage communities, leverage additional funding, and advance OWEB's goals for watershed health and habitat restoration. As OWEB evaluates the future of the program, I encourage the committee to consider how Capacity funding can continue to strengthen and expand Oregon's watershed council network. Over the past 15 years, the Oswego Lake Watershed Council has built partnerships, secured grants, implemented restoration projects, provided environmental education, and developed the organizational systems needed to responsibly manage public funds. Although OLWC does not receive Council Capacity Grant funding, we have seen firsthand how organizational capacity translates into on-the-ground outcomes and stronger restoration outcomes. Today, through the West Willamette Watersheds (W3) Collaboration, we are exploring opportunities to expand watershed council services into areas that currently have gaps in watershed council coverage. This effort will significantly increase both the geographic area and population served, bringing restoration, stewardship, and community engagement opportunities to historically excluded communities. As the watershed councils in Oregon continue to evolve, I encourage OWEB to consider how the Capacity Program can support organizations that are building local capacity, expanding service to new areas, and helping advance watershed and habitat restoration goals across Oregon. Thank you for your consideration.</p>

Submission Date: 06/05/2026 06:56 PM CST

Submission ID: e886d55a-2e9a-4255-ae3b-768542f409d1

Record ID: 53373

First and Last Name	Alexis Barton Castro
I wish to provide (select one):	both written and verbal comment
Name of Committee (required)	Partnerships & Capacity Committee
Type Comment Here (comments may also be uploaded below):	<p>To the OWEB Partnerships & Capacity Committee, Thank you for the opportunity to submit public comment ahead of your discussions about the Capacity Rulemaking process. The work of Watershed Councils advances OWEB's mission to help protect and restore healthy watersheds and natural habitats that support thriving communities and strong economies. Capacity funding is central for Watershed Councils to in turn apply for OWEB's other funded areas as well as for non-OWEB funding. We encourage OWEB investing further in this program. The Capacity program is underfunded - it isn't currently meeting statewide needs. There are functioning watershed councils who are deserving of this funding source, but are not eligible due to the cap on how many can receive this funding. As one of multiple watershed councils that doesn't receive Capacity funding, we encourage OWEB to raise the cap of the number of Councils who can receive this funding. It's important to me to clarify that we do not want the slices of the pie to become smaller in order to accommodate more organizations. We instead request that OWEB fund this program at a higher level. Watershed Councils who have received OWEB Capacity funds should not experience a reduction in their funds; even without dividing the pie differently, overhead expenses and basic operating costs have increased in recent years beyond the rate of Capacity funds increasing. It is challenging to secure ongoing funding in order to obtain or access funds, OWEB or otherwise. Providing more equitable access to Capacity funds, and providing an increase overall in funds available per council, would be a wise investment. To reiterate, we encourage OWEB to increase the cap of watershed councils who can receive Capacity funding, and to invest further in this program. Thank you, Alexis</p>

Submission Date: 06/05/2026 06:17 PM CST

Submission ID: 6e9af795-99c2-4661-a02f-0e920445825e

Record ID: 53370



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June 5, 2026

To: Oregon Watershed Enhancement Board Partnerships & Capacity Committee
CC: Sara O'Brien, Executive Director
Eric Williams and Brian Wolcott, OWEB staff

RE: Capacity Rulemaking Considerations

Dear OWEB Partnerships and Capacity Committee,

I have greatly appreciated the open and thorough discussions between OWEB staff, Watershed Councils, and SWCDs in the Pre-Rulemaking conversations around future Capacity funding. I'm afraid I have a conflict and can't attend the meeting so am submitting written comments.

I believe the pre-rulemaking summary accurately captures absolutely critical points of the current experience with Watershed Councils, both the one I lead now and my past experience with other Councils. The summary also misses a couple of key points.

Our Council firmly agrees with the following points:

- Council capacity Funding is essential to organizational health, which drives restoration success that is the crux of both OWEB and the Council's missions. To see the risk of low organizational health on restoration outcomes, we need look no further than the case of the Sandy River Watershed Council, which closed its doors (and is finally getting re-started years later) due to inadequate financial management and oversight and poor rushed contract procedures that created undue risk. I wonder how many years of effective restoration were lost while the Council declined, dissolved, laid dormant, and is now finally existing again with reduced capacity. The back end – financial management, contracting, grant oversight, and so on – are exactly what Councils need to fulfill the restoration mission over time.
- Functioning Councils Who Are Not Eligible Should be Included: As the leader of a high-performing Council that is ineligible for Capacity Grants, I know firsthand how much strain it puts on our infrastructure while we are in the process of managing a large-scale dam removal effort in the many millions of dollars, but without any accounting services or financial/grant management

staff, because we do not have a source of operating funds that can cover those costs. We are not the only Council in this position.

- Capacity Funding should be stable and noncompetitive. This is essential to allowing Councils to move forward with the work. While we agree that a basic level of oversight and verification is always warranted, a competitive process will simply widen the gaps between the resourced and under-resourced Councils. The continued uncertainty in project costs, wildfire impacts on projects, uncertainty in federal funding (both future and already awarded) mean flexibility is essential. The only thing that can provide flexibility is flexible and stable funding.
- Rising Operation Costs Undermine Capacity: Costs are going up rapidly: our Council, for instance, faced a 26% increase in employee health insurance premiums from 2025 to 2026 and are expecting this to be repeated, or worse, with the closure of Providence Health Plans. This is mirrored in costs of financial services, construction inflation, and fuel, all of which outpace regular inflation. Audit costs- which typically start at about \$40,000 - is something our Council will face after FY26-27 or 27-28, when we exceed the federal Single Audit threshold. These costs cannot be billed to project grants and the de minimus overhead is not sufficient to cover them.

Lastly, there is one key aspect that is not included in the summary, but is important: When the Councils that are not currently eligible are made eligible – which currently seems quite arbitrary – there is the risk that the available funding will be divided into smaller amounts. This would be regrettable given the already-noted rising costs of basic operations. I urge the Committee, and the Board, to invest more in Council Capacity to keep pace with the true costs of operating a Watershed Council.

Thank you. As a Rulemaking Advisory Committee is convened, I am happy to participate.

Sincerely,

A handwritten signature in blue ink that reads "Neil Schulman". The signature is written in a cursive, slightly slanted style.

Neil Schulman
Executive Director



June 3, 2026

To: Oregon Watershed Enhancement Board Partnerships and Capacity Committee
Re: Pre-RAC Engagement on District Capacity Grant Rulemaking

Dear Committee Members,

We thank the Committee for this opportunity to provide comments on the pre-RAC engagement for District Capacity Grant Rulemaking.

The Oregon Association of Conservation Districts (OACD) greatly appreciates the extensive outreach and engagement efforts undertaken for this new rulemaking was happy to be able to co-host the opening webinar on February 4th with the Network of Oregon Watershed Councils as part of the Oregon Conservation Partnership.

The comments shared during these sessions have been very enlightening. As they pertain to the SWCDs, they add specificity to the comments we provided to the OWEB Board:

This rulemaking is a new one for OWEB, however, it is not that there have been no rules. As you are aware, these grants are a partnership between OWEB and the Oregon Department of Agriculture (ODA). There are rules, managed by ODA, governing the scope of work and reporting, as well as statutory requirements on the Districts that must be met in order for the Districts to be able to plan and implement restoration projects on the ground. The grant budgets are currently divided 70% to the scope of work and 30% to capacity. Thus, the "capacity" aspect of this grant is of great importance to Districts, particularly to those without tax levies (>2/3 of Districts).

I have provided OWEB staff with details of districts' annual costs to "have the doors open" in order to plan on-the-ground projects.

We look forward to the RAC itself and will share recommendations for SWCD RAC members with staff at our monthly meeting in June.

I apologize for not being able to attend the meetings of this important committee, it is typically at the same time as our OACD Board meetings.

Thank you for the opportunity to provide these comments to the Committee.

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a long, sweeping horizontal line.

Andrea Kreiner, Executive Director
Oregon Association of Conservation Districts
Andrea.Kreiner@OACD.org