



# Hood River Soil & Water

CONSERVATION DISTRICT

3007 Experiment Station Rd.  
Hood River, OR 97031  
541-386-4588  
[www.hoodriverswcd.org](http://www.hoodriverswcd.org)

January 9, 2024

Oregon Watershed Enhancement Board  
Small Grant Rules Advisory Committee

RE: comments on recent changes to the small grant rules

Dear OWEB Small Grant RAC,

Recent language added to the OWEB small grant rules through the RAC process are concerning to staff of the Hood River Soil & Water Conservation District and warrant further discussion. The following language was added to Oregon rule 695-035-0050, Eligible Small Grant Projects (g) Water Quantity and Quality/Irrigation Efficiency: "In addition to the Project Completion Report requirements found in 695-035-0040(10)(g)(C), the report shall include demonstration that an application to the Oregon Water Resources Department for lease, transfer, or the Allocation of Conserved Water program has been submitted that dedicates the saved water, or a portion of the saved water, for instream purposes". Water Quality has also been red lined for removal. Below are some comments from the Hood River SWCD.

We use the Small Grant program for irrigation improvement projects that reduce water use on-farm. These benefits are realized at the diversion points (irrigation district diversions), but not measured/not measurable. The savings are small compared to the larger flows diverted and flows left instream.

Small grants should not be overburdened with the requirement of measuring in-stream flow benefits.

This measuring requirement is inconsistent with any other small grant project type. No other small grant project has the level of monitoring that is being proposed for irrigation upgrades.

Application of Conserved water does not work well on very small parcels. It also may not work well on large irrigation districts that manage one point of diversion. For example, Farmers Irrigation District has 2,000 accounts. The practical realities of trying to manage reduced water rights on a parcel or portion of a parcel would be impossible. Costs also would make it prohibitive.

Would mandating flow meters meet the requirements? What about a letter from the Irrigation District saying that the project will lead to reductions in water diverted?

Small grants should be easy to use, access, and have basic requirements. This is overburdening the program.

*"To provide educational, technical and financial assistance to our community for the protection, conservation and restoration of natural resources."*



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This will kill our irrigation improvement program using small grants.

This will send a message to farmers that their efforts at conserving water are not seen as doing enough for fish and wildlife. It also sends a message that OWEB doesn't want to help farmers become more water efficient.

In the Hood River Valley, irrigation improvement projects funded by the small grant program occur on small footprints (small orchard blocks), and the water savings are therefore small compared to the amounts diverted by the irrigation districts. It would be impossible to show the savings as a measurable amount instream. Only collectively do these projects work.

We have years of data showing reduction of flow at the farm's water turnout (on-farm) following irrigation upgrades. We have required soil moisture monitoring. We have used data to develop an irrigation calculator to determine quantities of water estimated to be saved following a project. We have required flow meters. Is this not enough?

Would testimonials from growers help? Irrigation Districts on how they manage their points of diversions and returns, and how growers manage their irrigation sets? That irrigation districts don't plan to reallocate any of the "conserved" water from these projects to additional acreages?

With an Application of Conserved Water, 25% of the saved water would be dedicated instream and 75% of the saved water available for other uses by that landowner. What happens here is that 100% of the water being saved is left instream and there are no downstream users "taking" that water.

Beginning with the 2001-2003 biennium (11 biennium), the Hood River SWCD has completed 82 irrigation improvement projects over 884 acres. Project size averages 10.8 acres per project. Total OWEB funds used: \$825,640 and landowner match \$710,497. Average CFS saved per project (as estimated with our irrigation calculator) is 0.073 cfs per project, with a total savings of 6 cfs spread across the three irrigation districts. We leverage federal EQIP funds and local ID funds. Without these small grant funds, there will be no place for small acreage farmers to go for assistance with an irrigation upgrades.

The benefits of these projects in our district is a win-win for farmers who want to save water in the face of climate change and have healthier trees. It is also a win for our streams and rivers because water saved through these projects is not diverted and is left instream. We would like to keep doing these projects to maintain the positive benefits achieved through the program.

Sincerely,  
Hood River SWCD

*"To provide educational, technical and financial assistance to our community for the protection, conservation and restoration of natural resources."*



• 1985 Country Club Road, Hood River, OR 97031 Phone (541)-387-5261 www.fidhr.org •

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January 9, 2024

Oregon Watershed Enhancement Board  
Small Grant Rules Advisory Committee  
775 Summer St NE #360  
Salem, OR 97301

RE: comments on recent changes to the small grant rules

Dear OWEB Small Grant RAC,

Farmers Irrigation District (FID) has concerns with some of the proposed changes to the rules regarding the Small Grant Program at OWEB. The following language was added to Oregon rule 695-035-0050, Eligible Small Grant Projects (g) Water Quantity and Quality/Irrigation Efficiency: "In addition to the Project Completion Report requirements found in 695-035-0040(10)(g)(C), the report shall include demonstration that an application to the Oregon Water Resources Department for lease, transfer, or the Allocation of Conserved Water program has been submitted that dedicates the saved water, or a portion of the saved water, for instream purposes".

FID has worked with the Hood River SWCD and the Hood River Watershed Group to promote and realize on-farm water efficiency projects within our service area. This has been a successful partnership over many years, converting hundreds of farming acres to more efficient water application methods. The funding provided through the Small Grant Program has allowed our basin to realize tremendous benefits for the watershed. Because our system is closed and pressurized, water savings on-farm means water left instream.

The proposed rule change would effectively mean the end of our District's use of this grant program, and I would suspect most other irrigation districts. We have complicated water rights that require a full-time employee to maintain as it is. With this change, you would effectively be creating small pockets of partial parcels with reduced duties and rates, which need to be managed separately. With 2,000 accounts, this would make administering our water rights obligations nearly impossible. Allocations of Conserved Water work great at the District level or for individual water right holders outside of a District. They don't work for single parcels or portions of parcels within an irrigation district.

Please don't take this valuable conservation tool off the table for our basin. We have done good work with OWEB funds for decades and produced real results. We would like to continue with this work into the future.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to read "Les Perkins", is written over a light blue horizontal line.

Les Perkins, Manager  
Farmers Irrigation District

**From:** [oregon-gov-web-services@egov.com](mailto:oregon-gov-web-services@egov.com)  
**To:** [BETTINARDI Nicole \\* OWEB](#)  
**Cc:** [REPPLINGER Linda \\* OWEB](#)  
**Subject:** Public Comment  
**Date:** Thursday, December 28, 2023 4:40:17 PM

Some people who received this message don't often get email from oregon-gov-web-services@egov.com. [Learn why this is important](#)

First and Last Name	Fran Recht
Phone Number	541-765-2229
Email Address	franrecht@gmail.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):	OWEB Rulemaking Advisory Committee (Small Grant Program Division 35)
Agenda Topic / Item Letter	RAC SGP Potential Revisions
	<p>Hello. I am Fran Recht the small grant administrator for MidCoast Small Grant Team 03. Re Section 695-035-0020 (3)...regarding the Board entering into a Program Grant...the last phrase is unwieldy and unnecessary : "and all representatives of the Team have met OWEB reporting obligations under earlier agreements". It can hold groups up from getting a new agreement for</p>

Type  
Comment  
Here  
(comments  
may also  
be  
uploaded  
below):

many months to a year waiting for each participating group to clear up any report dues. Why penalize the full group rather than just not allowing those member groups with pending reports not be eligible to apply as happens now with the regular grant program? Our Small Grant Team (Team 3) has 14 groups that need to be invited to be on the Team (and your proposed rules could allow even more groups to request membership) and currently 9 have signed the required documents. We don't have an agreement due to this (one of our member groups had a lot of turnover and has 5 pending grants) and we can't accept applications. It is a headache and uncomfortable to continue to harrange offending parties. This happened in the last biennium too and I was told to just drop the group from the team. We never got an agreement in place until very late in the biennium. I spend way too much time trying to allow a small grant team for this area to function and it doesn't at all seem worth the effort. Even if you provide administrative funding for small grant team administration under 695-035-0015 (5), I think that this program may have too big a frustration to satisfactor ratio to attract new administrators (which I'll be looking for since I plan to retire this summer). If you do provide administrative team funding and the above requirement doesn't get changed, administrative funds awards should reflect a higher payment to those who have many groups to wrangle, not only the time involved . Thank you.

**Submission ID:** 14484c28-cc30-41bf-b571-3469fbf93f69

**Record ID:**

## BETTINARDI Nicole \* OWEB

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**From:** oregon-gov-web-services@egov.com  
**Sent:** Monday, January 8, 2024 2:54 PM  
**To:** BETTINARDI Nicole \* OWEB  
**Cc:** REPPLINGER Linda \* OWEB  
**Subject:** Public Comment

Some people who received this message don't often get email from oregon-gov-web-services@egov.com. [Learn why this is important](#)

First and Last Name	Ken Diebel
Phone Number	541 910-4034
Email Address	diebelk12@gmail.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):	OWEB Rulemaking Advisory Committee (Small Grant Program Division 35)
Agenda Topic / Item Letter	Small Grant Program Division 35 Rules Revision Public Comment
Type Comment Here (comments may also be uploaded below):	

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Uploaded Files:

- [small grant public comment.pdf](#)

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**Submission ID:** b01d3426-f730-4b43-b695-d1d4c506b207

**Record ID:**

Re: Proposed Rule Changes to OWEB's Small Grant Program

To Whom It May Concern,

Thank you for the opportunity to comment on the proposed changes to the Small Grant Program. I am Ken Diebel, the Executive Director of the Malheur Watershed Council. I have been involved with OWEB before there was an OWEB. My first grant was from GWEB in 1995.

I have been the coordinator for the Council since 2014, and I have collaborated with the Council in other capacities since 1999. In that time, we have secured funding in excess of \$15 million to improve irrigation infrastructure, which as lead to significant improvements to water quality in our basin. An important part of our work is OWEB's Small Grant Program.

I would like to raise concerns regarding the proposed changes to the Small Grant Program:

1. OWEB staff recommendation that applicants use other funding sources to implement irrigation efficiency projects.

We already pursue funding from BOR, NRCS, and OWRD. We have been successful in getting money from these agencies. However, these types of grants rarely apply to the irrigation efficiency projects we typically fund through the Small Grant Program. If they do fit, the OWEB money is a small, but important, piece of the funding. Our cost-share is many times over what OWEB provides. This leveraging of funds is a benefit to OWEB because we treat more acres with the same amount of money.

The other funding avenue, the OWEB Open Solicitation Program, is already under funded. Adding another set of applications will only make things worse.

If OWEB staff needs more detail in our small grant proposals about the environmental benefits of each project, we can certainly provide that. OWEB should realize that our local committee reviews each project for its technical and environmental merit. If OWEB is finding this inadequate, OWEB could help by providing more specific guidelines.

2. My second concern is the following proposed rule change language:

"an application to the Oregon Water Resources Department for lease, transfer, or the Allocation of Conserved Water program has been submitted that dedicates the saved water, or a portion of the saved water, for instream purposes."

In the Malheur Basin, this will not accomplish any environmental goals. Our problem is that we are short of clean water, and irrigation induced erosion is the cause of the water quality problems. Putting this requirement in the rules will stifle our progress because few people will be willing to participate.

I suspect it would be impossible for OWRD to measure or enforce this provision. These small instream rights would be within measurement error given the technology that exists for measuring water.

A complicating factor is that most individuals do not control their water right, per se, in the Malheur Basin. They are part of an irrigation district or ditch company. The water right belongs to the irrigation district, and the landowners pay the district/company to use the water. It would be difficult for an individual to designate an instream right.

Another concern with this language is that it doesn't fit the water quantity problems that we have in the Malheur Basin. The fish that need water, the federally listed bull trout, are above the irrigated areas. What this species does require, according to the US Fish and Wildlife Service, is a minimum pool in Beulah Reservoir for winter habitat.

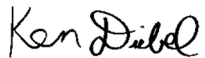
The Vale Irrigation District has agreed to leave water in the reservoir for the trout. Our irrigation efficiency projects help them to meet their target for the minimum pool. Conserved water for instream purposes doesn't

apply to this situation and making it a requirement for the Small Grant projects will harm the Irrigation Districts' ability to meet its goals.

In summary, the proposed rule changes and the OWEB staff recommendation will significantly harm our small grant program. More importantly, it will harm our progress in achieving state and federal goals for water quality. Improving water quality has always been an important part of OWEB's mission. It will also harm our ability to maintain a minimum pool for the federally listed bull trout.

We have seen significant improvements as a result of our work. These proposed Small Grant rule changes will hamper our progress and will ultimately harm the environment.

Sincerely,

A handwritten signature in black ink that reads "Ken Diebel". The signature is written in a cursive, slightly slanted style.

Ken Diebel, Ph.D.

Executive Director, Malheur Watershed Council