



Grant Soil and Water Conservation District
Kenneth H. Delano Agricultural Service Center
721 S. Canyon Blvd. - John Day, OR 97845 - Phone (541) 575-0135

November 16, 2022

State Board of Agriculture
Oregon Department of Agriculture
635 Capitol Street NE
Salem, OR 97310

RE: ODA-DEQ Draft 2022 Memorandum of Agreement (MOA)

Chair Santamaria and Members of the Oregon Board of Agriculture:

Grant Soil and Water Conservation District (SWCD or District) Board of Directors would like to offer Public Comment on Agenda Item No. 5, the draft Memorandum of Agreement (MOA) between the Department and the Department of Environmental Quality regarding Collaboration on Achieving Water Quality Goals Relating to Agricultural Nonpoint Source Pollution.

The District outlined specific concerns regarding the MOA in our letter dated September 14th, which were addressed by ODA staff during a phone conference on November 7th; however we wish to voice our general sentiments regarding the draft agreement and direction of the Agricultural Water Quality Management Program.

The District is very fortunate to count five, serving Directors and Associate Directors who were among the original members of the Local Management Area Advisory Committees (LACs) gathered to represent Grant County's agricultural interests for the development of the North and Middle Forks John Day River, as well as the Upper Mainstem and South Fork John Day River, Agricultural Water Quality Management Plans. These volunteers have stayed with the process, each devoting hundreds of hours over the last 22 to 24 years developing and revising Agricultural Water Quality Management Plans, reflective of local conditions and necessary for ODA to fulfill their obligations under SB-1010.

In volunteering, each LAC member placed their trust in a process that would result in an Agricultural Water Quality Management Plan that "would be theirs, otherwise, other interests would write the plan for them"; statements like this were repeated many times by ODA staff during the plan development process. The members felt a strong motivation to get it right for the sake of the agricultural industry. With this sentiment echoing in their minds and the promise that successful plans would result in reduced involvement with other agencies, the aforementioned five members, along with their colleagues, toiled through meetings, sometimes enduring derision from neighbors who felt "they were wasting their time", for the last few years of the 1990's and early 2000's to develop "their" Agricultural Water Quality Management Plan. All five continued to stay with the process through the next two decades engaging in at least 8 plan revisions, each time watching agency-required elements that further distanced the Agricultural Water Quality Management Plan from the version they could claim as "theirs".

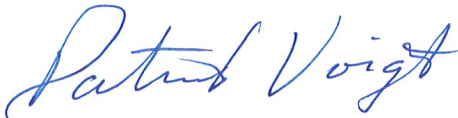
The District feels we have witnessed a gradual shift in the role and expectations of Soil and Water Conservation Districts in the years since the Plans were adopted. We feel our role has migrated from vital partners, whose participation was foundational to initiate the Agricultural Water Quality Program, to ineffectual bodies, whose role is to endorse somewhat mandatory Plan changes and programs with limited to no input in the development of those changes and programs.

We feel SWCDs continue to be relevant and a viable part of the process, consistent with the vision of the 1993 legislation which initiated this effort. Former Oregon Senator Ted Ferrioli, while attending a meeting of the Local Management Area Advisory Committee for the Upper Mainstem and South Fork John Day River Basin on November 28, 2000, stated "The SB-1010 planning process will work if landowners stay involved". The Districts and LAC members have stayed involved; however, only to the extent of the roles allowed by ODA.

When deliberating new programs, memorandum of agreements or other implementation orientated aspects of the Agricultural Water Quality Program, we respectfully ask the Board of Agriculture to consider the benefits that would accompany more inclusion of District's and LAC's expertise at an earlier stage. Grant SWCD alone offers five LAC members each with over two decades of experience, capable staff as well as an established track record of conservation project leadership and implementation.

We thank you for this opportunity and are looking forward to working with Oregon Department of Agriculture on efforts that provide the highest level of service for Oregon agriculture.

Sincerely,



Patrick Voigt
Chairman, Grant Soil and Water Conservation Board of Directors



Mark Owens
Oregon State Representative, House District 60