



Oregon Watershed Enhancement Board
775 Summer Street NE
Salem, OR 97301-1290

RE: Comments on OWEB Monitoring Grants Rules
March 2, 2020

Oregon Watershed Enhancement Board Staff and Board members,

Thank you for the opportunity to provide comment on the proposed revisions to OWEB Monitoring Grants rules. We appreciate the efforts of OWEB's Board, staff, and rules advisory committee members. We have proposed specific revisions to the draft language and a rationale for the proposed revision.

695-025-0080

Purpose

Suggested revisions (highlighted in yellow):

In accordance with Section 4b. (2) of Article XV of the Oregon Constitution and ORS 541.956, OWEB may consider grant applications that propose monitoring activities necessary for carrying out eligible restoration or acquisition projects that either protect or restore native fish or wildlife habitat, or protect or restore natural watershed or ecosystem functions in order to improve natural functions, water quality, or stream flows.

Rationale:

The intent of our proposed revision to the draft Purpose statement is to more accurately reflect the language voted on in Measure 76 and included in ORS 541.956. The current draft purpose statement paraphrases the statute but in doing so, appears to eliminate language around projects that protect native fish and wildlife habitats or protect natural watershed functions to improve water quality or stream flows.

Our concern is the current draft language is creating a system in which eligible actions are all geared towards the new and next restoration or acquisition project. While much work remains to be done for our native fish and wildlife habitats and watershed and ecosystem functions, I am concerned about a grant-making structure that operates only in service of creating a new restoration or acquisition project.

There is very clear language in Measure 76 that the natural resources fund is intended to accomplish things such as maintaining habitats needed to sustain healthy and resilient populations of native fish and wildlife and maintaining the diversity of Oregon's plants, animals,

and ecosystems. Please remember that staff and board members change over time. Even more important is clear rules and guidance so that interpretation does not change as personnel change.

The Oregon Plan, Oregon Conservation Strategy, and other recovery plans consistently point to protecting functioning and intact habitats as effective and cost-effective strategies for meeting stated goals. With existing areas of intact habitats - that may not need restoration but are worth protecting - and OWEB's ever-growing legacy of investments, we encourage the Board to consider revisions to the rules so that they do not potentially eliminate valuable monitoring activities. These activities will be increasingly important as the range of restoration work continues to grow and as we face challenges such as climate change that will impact our ecosystems in various ways.

Additionally, in concern to "applied science:"

Watershed Councils have benefited from long term monitoring studies done to either prove or disprove theories about such things as salmon life histories, the role of large woody debris in creating in-stream habitat, the value of estuaries for salmon. Research is critical to our function, and testing theories and new applications is essential to efficient and effective restoration projects. For example, the results of these studies have certainly changed local perspective on the value of estuaries for salmon (let alone the actual science).

Our suggestion would be to limit OWEB support for research activities to those that directly benefit watershed restoration projects. The language could be more outcome-based to make the distinction between funding research just for the sake of research, and research that directly benefits watershed councils in a way that ensures OWEB restoration dollars are being spent wisely, and with a scientific basis for the important council's do.

Respectfully,

A handwritten signature in blue ink, appearing to read "Kelly Timchak". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Kelly Timchak
Board President, Network of Oregon Watershed Councils