

## Oregon Territorial Sea Plan: Part Three Amendment – Phase 3

### Rocky Habitat Working Group Meeting – November 9, 2020

Initial Site Management Designation Proposal Period

#### PUBLIC COMMENT

The comments below have been recently submitted on behalf of several organizations regarding a request to extend the Initial Proposal Period. Please review and prepare to discuss.

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I just wanted to let you all know that there is still a lot of interest from community members to extend the rocky habitat initial proposal phase another 4-6 weeks (beyond Dec. 31) to give folks a chance to do adequate stakeholder engagement and other items needed for proposal submission given the challenges with Covid and more recently the fires that directly affected some of the coastal communities. Also, a lot of folks want to learn the details of how the submitted proposals will be evaluated with the rubric that has been mentioned to help guide their proposal writing. There was an expectation that this rubric would have been available earlier in the process.

The coastal communities I've been in touch with would like to see an agenda item to discuss this issue at the next working group meeting on Nov 9th.

Thanks,

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Joe Liebezeit  
Staff Scientist & Avian Conservation Manager  
Portland Audubon

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The Audubon Society of Lincoln City (ASLC) believes there are substantial reasons to extend the initial proposal period. We are requesting a 4-6 week extension and hope the Working Group will discuss an extension at its November 9th meeting. Reasons for the extension include:

- The pandemic has made stakeholder outreach problematic and challenging. COVID-19 has been a major disruption to business and people's lives. Traditional public meetings are not possible and many community groups are not holding meetings so public engagement has been difficult.
- The pandemic has also caused additional constraints and workload for agency staff. While LCDC and staff at other agencies have been very responsive to information requests given these circumstances, we recognize their capacity is uniquely limited at this time. This situation has made it difficult to get essential information to prepare proposals and share with stakeholders.
- The wildfires disrupted peoples' lives on the coast in an unprecedented way. Lincoln City was particularly affected. The attention of County Commissioners and other decision-makers continues to be rightfully focussed on recovery from the wildfires, thereby making it difficult, if not inappropriate, to divert their attention to other issues such as rocky habitat.

- The state and tribes just decided on how to interface with the public proposal process and we are excited to reach out to the tribes, but that has only just begun. It was unclear most of the summer if it was appropriate to reach out to tribes prior to state consultation since many questions regarding how the tribes would like to interface with the public process existed.
- The draft document of criteria by which the proposals will be evaluated by the Working Group has just become available. Depending on the timeline for review and finalization of these criteria, groups may not have sufficient time to adequately incorporate them into their thinking regarding proposals.

A 4-6 week extension of the initial proposal period seems reasonable given these unanticipated conditions. We acknowledge that a longer extension may have an adverse effect on the overall schedule for implementing the Strategy. At a minimum, allowing proponents to append their proposals with documentation of additional stakeholder outreach through the end of the initial public comment period would be very helpful.

Thank you for your consideration.

Kent Doughty  
ASLC Rocky Habitat Campaign Coordinator

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Based on regular coastwide meetings we have been having with proposal writers and stakeholders over the past several months, it appears there is strong interest and consensus for an extension of the deadline that Kent proposes for your consideration. We believe this request balances the needs and demands of the RHWG, the process, and the several entities developing site designation proposals, without risk of derailing or significantly delaying the process.

We realize some of the circumstances Kent mentions as reasons for requesting an extension are beyond your control. Also, as voiced by many proposal writers the proposal process by its nature is daunting and some have expressed frustration with what might be seen as somewhat of a moving playing field (e.g., new or revised documents and guidance coming out while proposal writing has been happening for months, with the time window for IPP submissions fast closing). I can just say that even for someone accustomed to this type of work, it is a very complex undertaking, one of the most complex in my decades of doing related work, including writing proposals.

We sincerely appreciate your cooperative spirit and actions, including the recently posted draft evaluation criteria, and the support we've received from you and agency staff, and thank you for your consideration of our request for a deadline extension.

Very best,

Larry

Larry Basch, Ph.D.  
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member, Board of Directors, Oregon Shores Conservation Coalition  
Research Associate, Oregon Institute of Marine Biology