



Agency Feasibility and Completeness Analysis

This guide is intended to facilitate the agency review of rocky habitat site management designation proposals during the Initial Proposal Period of the Territorial Sea Plan – Part Three (TSP3) amendment process. Proposals will be assessed for completeness to determine if all necessary information has been included in the proposal, and that it is sufficient in nature to conduct agency review. Agency representatives (e.g. ODFW, OPRD, DSL, DLCD, or others based on the details of individual proposals) will then provide analyses of the practical feasibility of implementing the proposal under relevant agency authority and jurisdiction, including alignment with the goals and policies of the Rocky Habitat Management Strategy.¹ Oregon Coastal Management Program staff will also forward proposals to federally-recognized Oregon Tribal Nations with interests in the coastal zone², and may engage in consultation as necessary.

Questions

Please fill in information and answer the questions below for *each* rocky habitat site designation proposal, and provide a brief summary report at the end. Please provide additional information, interpretation, concerns, or context where necessary. Some of the information may be duplicative with the Working Group evaluation to ensure consistent interpretation, transparency, accountability, and historic preservation.

Evaluator Information

Evaluator name(s): Andy Lanier, Michael Moses, David Fox, Laurel Hillmann, Andrea Celentano, Shawn Stephensen

Evaluator role/position(s): Rocky Habitat Working Group Agency Staff

Evaluator affiliation(s): DLCD, ODFW, OPRD, ODSL, USFWS

Date of evaluation: January, 2021

¹ TSP3 Sections E. 3. & 4. Step 2 – Agency Feasibility & Completeness Analysis

² Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, Coquille Indian Tribe, Confederated Tribes of Siletz Indians, Confederated Tribes of Grand Ronde, and Cow Creek Band of Umpqua Tribe of Indians

Site Information

Proposed site location: Recreational Divers of Oregon Proposal for Kelp Forest Preservation in Rocky Subtidal Zones of the Oregon Coast

Designation category:

☒ Marine Research Area

☐ Marine Garden/Education Area

☐ Marine Conservation Area

Is this a proposal to add, delete, or modify a rocky habitat site designation?

☐ New Site Designation (addition)

☐ Existing Site Removal (deletion)

☒ Alteration to Existing Site

Name of principal contact: Leigh Anderson

Affiliated organization(s): Many of Oregon recreational divers as listed in 5 Facebook books totaling 3,834 members

Date of proposal submission: December 31, 2020

Proposal Completeness

Please answer each of the following questions as it relates to the completeness of the proposal.

1. *Is the proposal complete? Have sufficient responses been provided for all questions, including indications or explanations for those questions which are not relevant or applicable? If not, please indicate which question(s) are of concern.*

The proposal is complete, but does not fit the site-specific intent of rocky habitat management designations and consequently a proper review and analysis cannot be conducted at this time.

2. *Have sufficient data, information, and/or other relevant materials been provided in order to facilitate proper review and evaluation of the proposed designation?*

While the proposal does contain relevant information for proposal goals, it cannot be properly evaluated without site-specific intent.

3. *Is a rationale provided for any incomplete or missing information?*

Generally yes, with the exception of site-specific information.

4. *Does the proposal consist of one place-based submission? (A small network of designated sites is acceptable, provided they are all the same designation category.)*

No – the proposal is broadly focused on coastwide management of kelp and related biota, but does not indicate any site-specific needs or management.

Reviewer Comments and Feedback

In the space below, please provide a (brief) summary of the feasibility of this proposal, and a rationale for recommendation. If more space is required, please attach additional pages.

At this time, this proposal does not meet the completeness and sufficiency standards to facilitate proper proposal review. The proposal focuses on broad-based, coastwide management of kelp forests, and is not specific to any particular rocky site. While the agencies recognize the importance and timeliness of addressing management of kelp forests in Oregon's territorial sea, the provisions and activities proposed do not fit into the framework of the rocky habitat site-management designation process.

At this time, the agencies are recommending that this proposal not move forward for additional merit-based review. However, the activities proposed do not necessitate a site designation and may warrant OPAC consideration. Recommendations regarding herbivore management and species harvest rules could be forwarded by the Council to the Governor's office and ODFW commission, and implemented through rule changes developed in coordination with ODFW's marine resource program staff.

The agencies participating in the rocky habitat site management designation process (DLCD, OPRD, ODFW, DSL, USFWS), acknowledge the significant effort made by Oregon's recreational divers to develop this proposal, and thank them for their careful efforts to highlight the needs and concerns at this site.