From:	Ali Berman
To:	TSP comments
Subject:	Comments on rocky habitat proposals
Date:	Thursday, April 15, 2021 8:30:56 AM

To the Rocky Habitat Working Group,

I care deeply about Oregon's rocky habitat. In fact, I plan all my spring vacations to the coast around the low tide so I can go and photograph the incredible intertidal marine life - nudibranchs, chitons, sea stars, anemones, and so much more. I am deeply concerned that you are not taking the proposals that would protect eight vital habitats along the coast seriously and not using an objective evaluation rubric to make these important decisions. The eight proposals (Ecola Point MCA, Chapman Point MCA, Cape Lookout MCA, Cape Foulweather MCA, Coquille Point MG, Blacklock Point MCA, Cape Blanco MRA, and Crook Point/Mack Reef MCA) that were submitted to you were deep, had community input, concrete science, and were community led - just like you asked for. I stand with Portland Audubon asking for the following when you make the final decision on which proposals to advance:

Please work with site proposers to clarify any misrepresented information in the **initial site proposal evaluation summaries** that are currently available for the public to review. Any misinformation should be corrected and updated as soon as possible and prior to the working groups re-evaluation of proposals after the 30-day comment period.

Please do not evaluate proposals based on funding or the capacity of agencies' programmatic support for implementation. The proposals were meant to help shape long-term efforts and goals to improve site management. The rocky habitat plan clearly states that proposals cannot be rejected based on funding or capacity concerns.

We recommend strong consideration for 8 of the 12 proposals that have gotten significant stakeholder and community support, expert input, and include clear long-term goals and objectives. This includes: Ecola Point MCA, Chapman Point MCA, Cape Lookout MCA, Cape Foulweather MCA, Coquille Point MG, Blacklock Point MCA, Cape Blanco MRA, and Crook Point/Mack Reef MCA. Six of these sites were recommended for designation in the original 1994 Rocky Habitat Management Strategy so now is time for the State to follow through.

If you have a personal connection with any of these sites, please include

any testimonials or stories to make your case compelling.

In the future, we recommend DLCD use an objective evaluation rubric that is similar to other state agency frameworks. DLCD staff can take ideas from other state or federal agency public proposal processes. Objective evaluation processes are essential to any state-run public proposal process and would minimize much of the politicization of the process that has emerged.

Best,

Ali Berman
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