



*The League of Women Voters of Oregon is a 101-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.*

October 18, 2021

To: Mr. Andy Lanier  
Marine Affairs Coordinator  
Department of Land Conservation and Development  
[Andy.lanier@dlcd.oregon.gov](mailto:Andy.lanier@dlcd.oregon.gov)

Re: Comments on Rocky Habitat Management Site Designation Proposal Process  
(Section E and Appendix C).

We are grateful for the opportunity to provide a brief review of the draft amendments to update part three Section E and Appendix C of Oregon's Territorial Sea Plan, the Rocky Habitat Management Strategy.

The League of Women Voters of Oregon has policy documents and studies supporting our comments in this letter, specifically:

The LWVOR Offshore and Coastal Management policy supports responsible and responsive government management of the public's coastal and nearshore natural resources based upon: 1) A complete environmental assessment, cumulative impact analysis, and baseline data specific to Oregon and; 2) Recognition of coastal states and local government's rights, jurisdictions, and responsibilities to preserve and protect marine and coastal environment and economy.

The LWVUS Climate Change policy recognizes that climate change is a serious threat facing our nation and planet. We support an interrelated approach to combating climate change—including through energy conservation, air pollution controls, building resilience, and promotion of renewable resources—is necessary to protect public health and defend the overall integrity of the global ecosystem.

We have examined the draft recommendations and suggest some improvements for your consideration to the process.

#### Feasibility Review:

According to the draft document, the feasibility review of proposals considers six categories including: legality, agency processes required, interactions with other site-based management designations, credible information, acknowledged management issues, and alignment with other state management strategies.

The guidance document indicates "Proposal review must consider how each proposed site, both individually and in context of all designated sites, addresses and furthers the goals, objectives, management principles, and policies within the Rocky Habitat Management Strategy."

These are very broad considerations, and additional specific questions might be more helpful in focusing not only the proposer but also the reviewers in an assessment process to examine the dynamics and influence of climate change. Throughout these sections, we believe it would be important to have some consideration of implications or potential shifts of organisms, and preferred habitats due to the influence of climate. In examining the geographical location perhaps there would be a place for a specific question to comment on threats and opportunities, such as threatened by particular coastal development or change in extent of human use. Within this concept we think this would prompt the proposer and reviewer to begin to examine more carefully the opportunity for providing continuity of habitats, corridors, refuges associated with range shifts of organisms, or to consider the impact of rising sea levels, change in sediments, increased armoring of shorelines nearby, and the complex issues of climate change.

In addition to direct aspects of climate change, we suggest some consideration should be given to development of renewable energy infrastructure such as offshore wind and/or wave energy and the infrastructure associated with development. This is rapidly emerging and there may be a way to add this as emerging interests to questions regarding consideration of sites.

### Appendix C

We suggest that the opportunity for adding additional focus or more directed questions to bring these two themes into the process could become incorporated in **Part C. Site Uses**.

Part C requests information **based on the current site management**.

#### 1. Current site uses and infrastructure.

- a. Please describe the current users and uses present at the site. \* Uses may encompass recreational, commercial, cultural, and scientific.
- b. Please summarize existing site infrastructure. For example: large parking lot, public restrooms, paved trail access, etc.

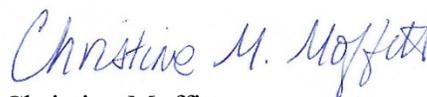
At this time, the Site Use prompts the applicant to state “Potential future uses based on the current site management and potential future use and management,” but with no direct reference to climate change impacts or aspects of renewable energy development offshore.

We are happy to see the section regarding **Stakeholder Engagement**. We applaud the reporting of positive and negative opinions. Perhaps there might be some additional questions regarding proposed tools that proposers will use to resolve or mitigate negative opinions.

Thank you for the opportunity to comment on this important document.



Rebecca Gladstone  
LWVOR President



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