



January 29, 2026

Department of Land Conservation & Development  
Ocean Coastal Management Program  
635 Capitol St. NE, Suite 150,  
Salem, OR 97301-2540

RE: Public Comment on Rocky Habitat Site Management Plan Drafts

CC: Governor Kotek, Coastal Caucus

Dear Mr. Lanier,

Please accept these comments submitted by the [Oregon Ocean Alliance](#) (OOA), a consortium of eight environmental conservation organizations invested in supporting Oregon's marine and coastal environment for fish, wildlife, habitats, and communities that depend on these resources.

### **Successful Development of Rocky Habitat Management Plans**

The OOA commends the Department of Land Conservation and Development (DLCD) on leading a collaborative and transparent process in the development of solid management plan drafts for eight newly designated rocky habitat management areas. Site management plans are critical to ensure the effective and efficient implementation of the Rocky Habitat Management Strategy. These plans also represent a milestone for the Territorial Sea Plan (TSP), providing a vital framework for balancing marine resource protection with sustainable development for our coastal communities.

The agency's collaborative and transparent approach exemplifies the "Oregon Way", ensuring ongoing community involvement and engagement with the newly designated rocky habitat sites. We are also encouraged to see that the management plans seek the engagement of indigenous communities and Tribes in stewardship, monitoring, protection, and restoration efforts for rocky habitats.

CC: Governor's Office Natural Resource Advisors Chandra Ferrari, Geoff Huntington  
CC: Coastal Caucus

The OOA recognizes the rocky habitat site management plans as a milestone for the Territorial Sea Plan (TSP), which provides a framework for managing Oregon's 3-nautical-mile-wide territorial sea and adjacent shoreline. The TSP aims to balance marine resource protection with sustainable development, guiding agencies, and reducing conflicts between uses, including conservation, fishing, recreation, and emerging energy projects by applying specific policies for different ocean areas, ensuring ecosystem health, and supporting economic benefits for coastal communities. Several years ago, community groups stepped up to propose sites for designation within the Rocky Habitat Management Strategy. The Ocean Policy Advisory Council (OPAC) reviewed and recommended eight proposals, which were ultimately approved by the Land Conservation and Development Commission in 2023.

### **Funding Need for Rocky Habitat Coordinator and Strategy Implementation**

Despite solid management plan drafts and excellent engagement with communities, the OOA is concerned that state agencies, in particular DLCD, as well as coastal communities, currently lack the capacity to implement the plans. Funding for DLCD's Rocky Habitat Coordinator, a critical position that led the management plan development effort, organized community meetings, and held informal coalition discussions, was not renewed this biennium.

In the 2025 legislative session, OOA supported the Rocky Habitat Stewardship Bill ([HB 3587](#)), which aimed to secure permanent staffing and grant funding for community outreach. While the bill ultimately did not pass, OOA continues to see a real need to fund a dedicated position at DLCD to lead public engagement and Rocky Habitat Plan implementation in collaboration with local communities, Tribes, and governmental agencies. OPAC also realizes this need and officially [recommended that the State of Oregon prioritize the TSP Part 3 Rocky Habitat management Strategy](#). Millions of visitors come to our rocky shores every year and we need to do all we can to ensure they are enjoyed sustainably. OOA is eager to work with DLCD, the Governor's Office, and the State Legislature to identify pathways to fund this critical work. In the near term, we respectfully recommend DLCD include a Policy Option Package for the 2027 legislative session to include a full-time Rocky Habitat Coordinator staff position.

### **Strengthening Our Coastal and Climate Resilience**

The Rocky Habitat Management Strategy directly advances the [Governor's Executive Order 25-26](#) goal of safeguarding natural systems that help Oregon adapt to climate impacts. The site-based policies, monitoring provisions, and interagency coordination create mechanisms for agencies, Tribes, and community groups to work collectively to identify and manage some of the state's most climate-resilient nearshore areas. The site designation process in the Rocky Habitat Management Strategy aligns with the Executive Order's directive to prioritize and expand protection of key lands and waters that support resilient communities and ecosystems.

When the Natural Resource Interagency Team meets to develop resiliency attributes (as directed in section 1.1.a of Executive Order 25-26), these eight newly designated rocky habitat sites (along with previously designated rocky habitat sites), should be considered as existing

protected “climate-resilient” habitats and we recommend additional rocky habitat sites eventually be considered for nomination to help attain the Executive Order goal of 10% more climate resilient habitats protected in the next 10 years.

We appreciate your consideration of these recommendations.

Sincerely,

Hannah Epstein, PhD  
Marine Conservation Manager  
Oregon Shores Conservation Coalition  
Co-Chair Oregon Ocean Alliance

Joe Liebezeit  
Statewide Conservation Director  
Bird Alliance of Oregon  
Co-Chair Oregon Ocean Alliance