

# Final Evaluation Findings

## Oregon Coastal Management Program

October 2016 to September 2023

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## Executive Summary

The Coastal Zone Management Act (CZMA) requires the National Oceanic and Atmospheric Administration (NOAA) to conduct periodic evaluations of the performance of states and territories with federally approved coastal management programs. This evaluation examined the operation and management of the Oregon Coastal Program by the Oregon Department of Land Conservation and Development, the designated lead agency, for the period from October 2016 to September 2023. The evaluation focused on three target areas: program administration, including staffing, partnerships, coastal nonpoint pollution control program status, federal consistency, and tribal engagement; community resilience, including coastal hazards and public access; and natural resource management and planning, including ocean planning and estuary planning.

The findings in this evaluation document will be considered by NOAA in making future financial award decisions concerning the Oregon Coastal Management Program. The evaluation came to these conclusions:

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its strong partnerships with local governments, other state and federal agencies, and the research community.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for the many steps undertaken to streamline, manage, and strengthen its federal consistency program.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its increased efforts around tribal engagement, consultation, and partnering.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its creation of planning tools, development of new policy, and delivery of technical assistance to coastal communities to advance community resilience to the coastal hazards of sea level rise, tsunamis, coastal inundation, and coastal erosion.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its comprehensive body of work to inform and advance public access planning and implementation at the local level by providing detailed standards, policy guidance, and public-facing mapping and database products to facilitate data sharing and collaboration and to prioritize investments.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its planning work through the Territorial Sea Plan, especially its efforts to update chapters to reflect current priorities and needs for rocky habitat management and undersea cables.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its national leadership in implementation of the Coastal and Marine Ecological Classification Standard.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its regional and national leadership roles in groups such as the West Coast Ocean Alliance, West Coast Ocean Data Portal, Coastal States Organization, Pacific Marine and Estuarine Fish Habitat Partnership, and many others. The Office for Coastal Management appreciates the program's role as leader, innovator, and expert in various ocean management topics, and for promoting information transfer, sharing lessons learned, and providing technical assistance in adopting and implementing new approaches to coastal management.

**Recommendation:** The NOAA Office for Coastal Management encourages the Oregon Coastal Management Program to seek opportunities to raise awareness at the state level about the critical role of the program in effectively managing coastal communities. While the program is meeting its match requirements under CZMA Section 306, there are risks in relying almost exclusively on federal funding for all staff and most program activities within the lead state agency. The Office for Coastal Management encourages the program and the Department of Land Conservation and Development to continue to explore options for sustainable funding within the department's state appropriation.

**Recommendation:** The NOAA Office for Coastal Management encourages the State of Oregon to work together with the Department of Land Conservation and Development and leadership across all of the relevant state agencies to raise awareness about impacts of the financial penalties related to the current disapproval status of the state's coastal nonpoint source pollution control program and to continue to track next steps and be prepared and responsive to whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval.

**Recommendation:** The NOAA Office for Coastal Management encourages the Oregon Coastal Management Program to look for opportunities to build capacity and sustainability for the federal consistency program.

**Recommendation:** The NOAA Office for Coastal Management encourages the Oregon Coastal Management Program to explore opportunities to provide more lead time and predictability for tribal consultations and engagement in order to have sufficient time to incorporate tribal input into working groups (e.g., Oregon Ocean Policy Advisory Council working groups) and explore strategies to assist tribes with capacity to participate.

**Recommendation:** The NOAA Office for Coastal Management encourages the Oregon Coastal Management Program to use its current efforts and CZMA Section 309 strategy for Estuary Management Planning to reflect on lessons learned to identify efficiencies. The Office for Coastal Management recommends that the program continue its work on the estuary planning guide and consider looking more broadly within the Department of Land Conservation and

Development and the state for support and incentives for periodic, voluntary updates of local estuary management plans.

## Program Review Procedures

The National Oceanic and Atmospheric Administration (NOAA) evaluated the Oregon Coastal Management Program in fiscal year 2023. The evaluation team consisted of Becky Allee, evaluation team lead, Kris Wall, regional coastal management specialist, and Doug George, physical scientist, all of the NOAA Office for Coastal Management; Bree Yednock, reserve manager, South Slough National Estuarine Research Reserve; and Melissa Britsch, senior planner, Maine Coastal Program. The support of the coastal management program staff was crucial in conducting the evaluation, and this support is most gratefully acknowledged.

NOAA sent a notification of the scheduled evaluation to the director of the Oregon Department of Land Conservation and Development, published a notice of “Intent to Evaluate” in the *Federal Register* on July 20, 2023, and notified members of Oregon’s congressional delegation. The coastal management program posted a notice of the public meeting and opportunity to comment in *The Oregonian* on July 28, 2023.

The evaluation process included a review of relevant documents and a survey of stakeholders, which helped identify target areas for the evaluation: program administration, community resilience, and natural resources management and planning.

A virtual site visit was conducted, and the evaluation team held meetings from September 11 to September 15 with program staff members and group discussions with stakeholders about the target areas. In addition, a virtual public meeting was held on Monday, September 11, 2023, at 6:00 p.m. The meeting provided an opportunity for members of the public to express their opinions about the implementation of the program. Stakeholders and members of the public were also given an opportunity to provide written comments. The NOAA Office for Coastal Management’s responses to written comments are included in Appendix A. NOAA then developed draft evaluation findings, which were provided to the coastal management program for review, and the program’s comments were considered in drafting the final evaluation findings.

Final evaluation findings for all coastal management programs highlight the program’s accomplishments in the target areas and include two types of findings that may require action by the program:

**Necessary Actions** address programmatic requirements of the Coastal Zone Management Act (CZMA) and its implementing regulations and of the state coastal management program approved by NOAA. These must be carried out by the date specified. Failure to address necessary actions may result in a future finding of nonadherence and the invoking of interim sanctions, as specified in CZMA §312(c) and 15 CFR 923.135.

**Recommendations** are actions that the office believes would improve the program but which are not mandatory. The state is expected to have considered the recommendations by the time of the next evaluation or dates specified.

## Evaluation Findings

This evaluation of the Oregon Coastal Management Program has found that the program is successfully implementing and enforcing its federally approved coastal management program, adhering to the terms of the federal financial assistance awards, and addressing coastal management needs identified in Section 303(2)(A) through (K) of the CZMA.<sup>1</sup> The NOAA Office for Coastal Management acknowledges that the withholding of 30 percent of CZMA Section 306 funds because the program has not been able to submit an approvable coastal nonpoint source pollution control program as required by the Coastal Zone Act Reauthorization Amendments (CZARA) continues to impact the program's capacity and, in particular, may impact the program's ability to support new initiatives and projects to improve coastal management at state and local levels. While the programmatic impacts from the funding loss due to disapproval of the coastal nonpoint program are very important to assessing the performance of the Oregon Coastal Management Program, they are not described in detail here. The previous evaluation findings from the Office for Coastal Management (published January 2017) detail impacts such as loss of planning support to coastal communities and reduced technical assistance provided to coastal communities by Oregon Coastal Management Program staff. These impacts continued during this subsequent evaluation period.

### Program Administration

The Oregon Coastal Management Program is a networked coastal program that integrates authorities of local governments and state agencies, with the Oregon Department of Land Conservation and Development serving as the lead state agency for the program. Coastal program staff members work closely with coastal local governments and state agency partners to successfully implement the state's federally approved coastal program. This section of the evaluation findings reviews the administration of the program by the Department of Land Conservation and Development. Particular attention is given to staff turnover, loss of staff positions, and actions taken on the disapproved coastal nonpoint pollution control program. Federal consistency and tribal engagement are also discussed under "Program Administration."

#### ***Staffing***

The Oregon Coastal Management Program has been impacted by staff turnover and the associated loss of programmatic expertise and institutional knowledge that can happen when staff leave. During the evaluation period, the program manager retired and some positions had staff turnover four or more times. However, the program has a good record of hiring staff with coastal community planning experience, which positions program staff to better communicate with coastal communities. Feedback received from evaluation participants is that the coastal program staff are highly competent, have the necessary skill sets to be successful, and are

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<sup>1</sup> 16 U.S.C. § 1455b(c)(3)



committed to the mission of the program. It was also clearly communicated that the staffing levels are not adequate to meet all the needs and requirements of the program, in particular as it relates to capacity with federal consistency (see subsection below for more detail).

Another consideration related to staffing of the program is how the program prioritizes work within an environment of limited resources. This can result in overextending the workforce, which may impact staff morale and retention rates. At the time of the evaluation site visit, the program was working on a strategic planning process that could support prioritization of program focus and allocation of resources, including staff. Under the constraints of reduced funding from CZARA withholdings, no supplemental state funding beyond a portion of match provided by the department, and increasing salary costs, utilizing the strategic planning process can focus work and guide staff resources to maximize effort and impact.

During the evaluation period, two positions were lost due to CZARA funding reductions to the Oregon Coastal Management Program: the coastal conservation coordinator and the coastal natural resources specialist. Currently the responsibilities formerly conducted by those positions are conducted through other existing positions or positions funded through temporary grants or state funds. The coastal program had several limited-duration positions during the evaluation period funded through state general funds and external grant funding. There are additional fellows who are project specific and whose projects will be completed within one to two years. These are temporary solutions to an ongoing funding deficit.

The Oregon Coastal Management Program is meeting the state match requirements under CZMA Section 306. However, the majority of match funding in direct funding categories is provided from networked state agency partners, not from the Department of Land Conservation and Development. Essentially, the coastal program depends on federal funding for all staff and most program activities within the lead state agency. This means that if federal funding were to be reduced or eliminated, even temporarily, the state's coastal program would not have Department of Land Conservation and Development-supported staff or funding to implement the program. The NOAA Office for Coastal Management sees a need for the Oregon Department of Land Conservation and Development to raise awareness of this vulnerability with agency and state leadership and to consider if there are alternatives to having the core coastal program staff funded almost exclusively with federal funding.

### ***Partnerships***

Despite the impacts to the program's federal funding from the withholding of 30 percent of CZMA Section 306 funds under CZARA, the coastal program continued to work toward advancing the coastal goals of the state in part by seeking competitive funding to supplement its annual noncompetitive funding and leveraging partner work. This subsection includes a subset of these partnerships. Other sections of this findings document describe additional partnerships.

The program was successful in securing two grants under the National Fish and Wildlife Foundation National Coastal Resilience Fund program to develop estuarine resilience action plans for coastal jurisdictions. The first award supported work in Tillamook and Coos Counties and included assessing vulnerability and identifying nature-based solutions to improve hazard resilience. The second award is supporting similar work in Lincoln and Lane Counties. Through these efforts, the coastal program coordinates steering committees comprised of local governments, state and federal agencies, tribal staff, and others. The work of the coastal program's regional representatives is critical in linking local communities and the state and providing support to their assigned regions and building partnerships.

The Oregon Coastal Management Program also leverages small grant programs that the Department of Land Conservation and Development (DLCD) provides to support coastal communities, such as through a partnership with the Oregon Department of Transportation that funded 11 transportation-focused projects in coastal jurisdictions. An example of this joint effort between the DLCD and the Department of Transportation is the development of an urban renewal plan in Coos Bay. The Front Street Blueprint includes a strategy for improvements related to highway access restricted by rail infrastructure, traffic circulation and connectivity, bike and pedestrian access and safety, public parking, wayfinding, and the waterfront. The city adopted the Front Street Blueprint in June 2022. Through state general funds, DLCD provides small technical assistance grants to local government partners to support similar efforts with local planning departments on a variety of land use topics.

Additional discussion of partnership as it relates to habitat research and monitoring and offshore wind is included in the "Natural Resources Management and Planning" section of this findings document.

### ***Coastal Nonpoint Pollution Control Program Status***

Under Section 6217 of CZARA, all coastal states participating in the National Coastal Zone Management Program need to develop coastal nonpoint pollution control programs (coastal nonpoint programs). More than 20 years ago, NOAA and the U.S. Environmental Protection Agency (EPA) approved Oregon's coastal nonpoint program, subject to certain conditions the state still needed to address to fully meet all CZARA requirements. Over the years, the Oregon Coastal Management Program and the Oregon Department of Environmental Quality, the two state leads for the coastal nonpoint program, worked closely with NOAA and EPA, and other state agencies, as needed, to address most of the conditions on its program. However, in 2015, NOAA and EPA found that Oregon had not submitted an approvable program (and therefore disapproved the state's program). Specifically, the federal agencies found that Oregon had not addressed gaps related to the management of nonpoint source pollution from forestry activities on state and private lands. According to the CZARA statute, when NOAA and EPA find that a state has not submitted an approvable program, NOAA is to withhold 30 percent of the funding the state receives under section 306 of the CZMA to support implementation of the state's coastal management program. See 16 U.S.C. 1445b(c)(3). Similarly, EPA is to withhold 30 percent of the funding the state receives under section 319 of the Clean Water Act that

supports the state's nonpoint source management program. Since fiscal year 2015, the coastal program has lost over \$6.2 million in section 306 funding because it does not have an approved coastal nonpoint program.

During the evaluation site visit, the evaluation team met with staff from several state agencies that are responsible for various aspects of the state's coastal nonpoint program to discuss progress in addressing the forestry gaps and implementing other aspects of the state's coastal nonpoint program. One effort highlighted during the discussion was a new "Private Forest Accord" agreement between timber and conservation groups that resulted in the state adopting revisions to its forestry rules in 2022 related to riparian areas, forestry roads, and landslide-prone areas, among other topics. Other achievements highlighted included the Department of Environmental Quality's Septic Smart program that promotes routine maintenance and inspections of septic systems, over \$8.4 million in watershed restoration projects funded through the Oregon Watershed Enhancement Board to improve coastal water quality and habitat, and the state's clean marina certification program that encourages marinas to adopt best practices to reduce polluted runoff from marina activities.

Beginning summer 2022, the Oregon Coastal Management Program and the Oregon Department of Environmental Quality staff began meeting again with NOAA and EPA to discuss what was needed for Oregon to address the gaps in its coastal nonpoint program to meet all program requirements. This effort will require coordination across many state agencies and constituencies, and the Oregon Coastal Management Program should play a central role in managing that process. The Oregon Coastal Management Program should also consider ways in which to communicate to departmental and state leadership the benefits of the reinstatement of the state's full allocation of federal funding under the CZMA. A fully approved program would bolster the program's capacity to implement and support actions that advance the goals of CZARA and support Oregon's coastal communities, economies, and habitats.

### ***Federal Consistency***

The Oregon Coastal Management Program has been working diligently to continue to make improvements in how it exercises its CZMA review authority despite challenges noted below. The program is notable in building strong working relationships with federal agencies even when the state and those agencies are in disagreement, such as with the disputes over dredging work in the Columbia River by the U.S. Army Corps of Engineers. The coastal program also played the lead role for the state in the complex review of the Jordan Cove Liquefied Natural Gas project, and NOAA notes that the state's review of the Jordan Cove project put a spotlight on the state coastal management programs and their effectiveness in providing states with a strong voice in the federal decision-making process. However, along with strengths of the coastal program's federal consistency program, the coastal program's federal consistency program has also faced challenges in recent years, including staff turnover and loss of institutional knowledge. In addition, the coastal program has reviewed a number of large-scale projects with significant attention, which has further affected staff capacity.

The coastal program's federal consistency program is based on numerous enforceable policies, which requires substantial effort to keep the program up to date through program changes. The program has devoted substantial time to reduce the backlog of program change updates, and the state recognizes the importance of addressing some anticipated needs. For example, with the potential for offshore wind energy projects off the Oregon Coast under an active process by the Bureau of Ocean Energy Management, the Oregon Coastal Management Program is currently evaluating its enforceable policies to ensure they will be able to effectively review proposed offshore wind energy projects.

During the evaluation period, the Oregon Coastal Management Program completed 60–100 consistency reviews per year. In most cases Oregon issued a concurrence, including some advance concurrences for U.S. Army Corps of Engineers activities. Notable reviews in recent years include:

- PacWave South wave energy test site – concurrence with conditions;
- Jordan Cove Liquefied Natural Gas facility – objection, which was upheld by the NOAA administrator on appeal; and
- U.S. Environmental Protection Agency National Pollutant Discharge Elimination System permit for offshore seafood discharge – objection.

Consistency review challenges for the coastal program include the number of reviews and the coordination of the number of people involved due to Oregon's numerous enforceable policies and networked structure. There is one staff person responsible for coordination of reviews across the state. This has proven to be a challenge. There is a demonstrable need for additional capacity and expertise in coordination of federal consistency reviews and for reviews of enforceable policies.

There have been multiple significant improvements made to the state's federal consistency review program during this evaluation period to try to address the challenges stated above. In support of permit applicants, the program created a screening tool to help permit applicants avoid sensitive habitats, a web-based spatial enforceable policy analysis generation tool to help potential permit applicants see which enforceable policies may be relevant to their proposed projects, and a standard procedure for notifying tribes about projects. The Spatial Enforceable Policy Analysis tool, as well as information on the coastal program's website, has helped make the federal consistency process more approachable for potential applicants. Internal to the program, the state has increased internal coordination on federal consistency and created a database for project tracking. This database automates review timelines and tracks project information, public comments, and tribal interactions, among other elements. The coastal program is also working to maintain institutional knowledge and networks among partners so people stay up to date with projects and are able to collaborate easily. The program has strengthened internal institutional knowledge preservation as well, including weekly tracking and check-in meetings and the upkeep of an internal federal consistency knowledgebase reference document. Staff also engage in monthly check-ins with NOAA Office for Coastal Management (OCM) to discuss questions and procedures related to implementation of federal

consistency authority, which helps maintain consistency between the Oregon Coastal Management Program and NOAA OCM.

## ***Tribal Engagement***

During the evaluation period, the Oregon Coastal Management Program has been working to increase its inclusion of tribes in policy, planning, and resource management activities. The Oregon Coastal Management Program recognizes that tribal nations may have limited capacity to address coastal management issues given limited resources and various competing priorities.

The coastal program was able to secure funding under the Bipartisan Infrastructure Law of 2021 that will be used to acquire property at Cape Foulweather, which will restore ownership to the Confederated Tribes of Siletz Indians. This property acquisition will conserve the undeveloped coastal property that hosts habitats rich in marine mammals, a rare salt spray meadow complex, and upland forest connections that are important to threatened species. The headland will provide opportunities for community resilience education and play a central role in the stewardship and conservation of these important tribal lands and waters. Partners in the project will build from this investment toward a conservation and education program that strengthens community resilience in an inclusive, informed manner. The Confederated Tribes of Siletz Indians worked with the Department of Land Conservation and Development for a number of years to advance this project. Specific actions by the program included recruitment for possible projects and co-development of project proposals.

The coastal program also met with tribes to share sea level rise adaptation strategies and assess how the tribes and coastal program can work together to address impacts from sea level rise. Possible impacts to tribes from sea level rise include loss of cultural resources, water scarcity (saltwater intrusion), coastal flooding, and changes to food resources. Possible opportunities for program support to tribes in this area include estuarine resilience action planning, data sharing, and continued support of acquisition and restoration projects already underway.

Through its work to engage with tribal communities, the Oregon Coastal Management Program recognized there were no procedures or processes in place for tribal engagement for ongoing and recurring activities, such as federal consistency reviews under the Coastal Zone Management Act. The coastal program supported a Sea Grant natural resource policy fellow who developed a procedure document that described best practices for how to communicate and coordinate with interested tribal governments during federal consistency reviews and also identified state policies of interest to the tribes for use as enforceable policies in the program's federal consistency reviews. The fellow worked directly with the tribes to create these procedures and best practices, which have informed not only coastal program work but also the rest of DLCD.

One tribal member shared with the evaluation team that they feel the CZMA is fairly complicated and noted that tribal staff could benefit from training. During the evaluation period, the coastal management program worked with the South Slough National Estuarine Research Reserve to deliver an introductory course on Oregon's coastal zone policies and statewide land use planning (i.e., Coastal Zone Management 101) for coastal practitioners. Engaging tribes in this training or something similar could provide a good opportunity to

address tribal needs as it relates to understanding the CZMA. Other training resources available to the tribes include Coastal Zone Management Act 101 and Federal Consistency Basics on Digital Coast, as well as nature-based solutions training and facilitation training.

As the program's efforts to engage more regularly and intentionally with tribes increase, the coastal program should promote the use of accommodations which can be made to allow for tribes to respond, comment, and participate. As such, tribes should be given lead time for comments on projects.

#### **Findings for Program Administration**

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its strong partnerships with local governments, other state and federal agencies, and the research community.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for the many steps undertaken to streamline, manage, and strengthen its federal consistency program.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its increased efforts around tribal engagement, consultation, and partnering.

**Recommendation:** The NOAA Office for Coastal Management encourages the Oregon Coastal Management Program to seek opportunities to raise awareness at the state level about the critical role of the program in effectively managing coastal communities. While the program is meeting its match requirements under CZMA Section 306, there are risks in relying almost exclusively on federal funding for all staff and most program activities within the lead state agency. The Office for Coastal Management encourages the program and the Department of Land Conservation and Development to continue to explore options for sustainable funding within the department's state appropriation.

**Recommendation:** The NOAA Office for Coastal Management encourages the State of Oregon to work together with the Department of Land Conservation and Development and leadership across all of the relevant state agencies to raise awareness about impacts of the financial penalties related to the current disapproval status of the state's coastal nonpoint source pollution control program and to continue to track next steps and be prepared and responsive to whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval.

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into working groups (e.g., Oregon Ocean Policy Advisory Council working groups) and explore strategies to assist tribes with capacity to participate.



## **Community Resilience**

### ***Coastal Hazards***

Oregon faces many coastal hazards such as coastal storms, tsunamis, and climate change. Expected climate change impacts include sea level rise and increased frequency and intensity of coastal flooding. Large storms also impact the coast and cause erosion, and the frequency of these storms is expected to increase with climate change. These hazards all pose a significant threat to coastal communities.

The coastal program has been implementing a number of approaches to addressing and managing coastal hazards and community resilience. These efforts include developing and utilizing best available hazard data, creating educational materials, developing guidance and model land use provisions, engaging with local governments and state agencies, and supporting local adoption of coastal hazard regulations. The coastal program's climate change adaptation work focuses on providing information and technical assistance to communities, including planning and outreach.

During this evaluation period, the Oregon Coastal Management Program created a collection of tools to assist communities in planning for sea level rise impacts specific to the Oregon coast both within estuaries and along the outer coast. The three resources in this kit support data acquisition, vulnerability assessment, and adaptation planning. The Sea Level Rise Impact Explorer assists communities and planners in accessing and exploring community data sets with respect to sea level rise impacts so they can understand the risks and plan accordingly. The Sea Level Rise Impact Assessment Tool is a digital workbook designed to help users inventory what activities take place within areas affected by sea level rise, assess vulnerability to harm, and prioritize further investigation into remedial and adaptive actions. The Sea Level Rise Planning Guide for Coastal Oregon is a document that provides a suggested approach to evaluating the assets and populations at risk from the impacts of sea level rise. It offers potential adaptation strategies to adapt to those impacts within Oregon's regulatory framework and provides authoritative information about sea level rise projections and impacts. It is intended to guide local planning, capital improvements, and development decisions on the Oregon Coast that support community resilience and ensure effective coastal management. The Oregon Coastal Management Program hosted a NOAA Coastal Management Fellow to support communities in Clatsop County in utilizing these tools for sea level rise adaptation planning.

To continue the program's work assisting communities in preparing for coastal hazards with tsunami planning, the coastal program co-developed the Earthquake and Tsunami Community Disaster Cache Planning Guide, which is being used to help municipalities prepare for a Cascadia tsunami. The program also received a project of special merit award from the NOAA Office for Coastal Management and a NOAA Coastal Resilience grant to integrate tsunami regulations into comprehensive land use plans in several communities. The program

collaborated with the Oregon Department of Geology and Mineral Industries (DOGAMI), which used modeling to show the impacts of a tsunami on coastal communities and evacuation routes. Using this information, local communities then adopted tsunami hazard land use policies, with three main approaches:

- Prohibiting new critical facilities (e.g., schools, hospitals, etc.) in the most hazardous tsunami areas;
- Requirements for evacuation facilities with new development; and
- Flexible development options for increased resilience (e.g., vertical evacuation structures integrated into hotels).

The Oregon Coastal Management Program also helped communities create tsunami evacuation facility improvement plans, an all-inclusive effort to identify needs, evacuation routes, and approaches for improving facilities and to provide education and outreach about tsunami risks. The coastal program helps communities use the tsunami modeling and hazard data, including access to map viewers hosted by the program for smaller communities with limited GIS capacity.

The Oregon Coastal Management Program convened a legislatively directed workgroup of relevant interest groups, local government staff, and state agencies to review the equity and consistency of the application of Statewide Planning Goal 18: Beaches and Dunes, Implementation Requirement #5 (shoreline armoring requirements). This focus group considered information related to the practical, political, technical, and scientific aspects of Goal 18 shoreline armoring requirements. The group created a report with recommendations to guide the next steps for the Department of Land Conservation and Development as it relates to shoreline armoring and coastal erosion policy. The department has moved forward with some of these next steps, including rulemaking to protect ocean-fronting public roads, an erosion control guidebook, and a dune management guidebook (updated from 1989). Through a NOAA Office for Coastal Management Project of Special Merit started in October 2022, the coastal program will update its beach and dune inventory maps for local government implementation of Goal 18. The program also supported an outreach fellow, who was valuable for developing and sharing information about Oregon's beaches and dunes, including a presentation series, a story map, and a brochure for oceanfront homeowners.

The coastal program also assists with addressing hazards to promote community resilience through the ongoing King Tides Project. This project is co-coordinated with Coast Watch, a nonprofit group. The project asks community volunteers to take and submit photographs of king tide events. Photos taken during king tides can show the impact of higher sea levels and storms on those sites. This information can help raise awareness of possible impacts from sea level rise and inform planning for coastal inundation. Staff for the King Tides Project created a new website; they are also improving the image tagging and sharing efforts and conducting outreach events that receive substantial media attention.

## ***Public Access***

Oregon has a strong and intentional focus on maintaining public shoreline access through state-wide policy drivers and legal requirements, including Statewide Planning Goal 17. Specific public access planning and implementation is managed at the local government level through comprehensive plans adopted by local governments. The Oregon Coastal Management Program provided a significant contribution to the success of these efforts by ensuring that local partners are well supported with both the policy frameworks and information resources that are needed to guide future planning and coordination. This included considerable effort to develop online tools and data inventories that provide up-to-date public access information along the coast and that enable local governments and agencies to more easily standardize data collection, update their information over time, and identify priority gaps to address equity, accessibility, and other strategic goals.

The Oregon Coastal Management Program recognized the need for additional resources to effectively address the most critical needs related to public access and was successful in securing additional capacity, both through NOAA's Coastal Management Fellowship and with funding from a NOAA Project of Special Merit to hire a temporary coastal public access coordinator to address the highest priorities. The dedicated positions and additional funding helped the program further develop this impressive body of work related to public access and ensure that updated policies and guidance were inclusive and informed by robust and equitable engagement. The program is also broadening accessibility by working with developers of the "Beaches" online application ([www.beaches.app](http://www.beaches.app)) to format Oregon's data in a way that can be viewed within that national tool, which is working to standardize and display data from all coastal states.

In addition to the dedicated capacity and resulting products for local governments, the Oregon Coastal Management Program also provided direct funding and technical assistance to communities to incentivize application of the tools and expertise within the program to advance public access planning. During the evaluation period, the coastal program funded two communities to update their public access inventories, policies, and zoning and created a model document to be used as a guide for other cities and counties and be part of Coastal Shoreline Public Access Planners Handbook. Tribal staff were also involved in the public access planning project and the development and review of this handbook for local governments.

To ensure greater sustainability of public access sites, the coastal program also linked its public access planning work with sea level rise, flood risk, and tsunami inundation information and tools the program developed (as discussed in the coastal hazards section of this report).

## **Findings for Community Resilience**

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its creation of planning tools, development of new policy, and delivery of technical assistance to

coastal communities to advance community resilience to the coastal hazards of sea level rise, tsunamis, coastal inundation, and coastal erosion.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its comprehensive body of work to inform and advance public access planning and implementation at the local level by providing detailed standards, policy guidance, and public-facing mapping and database products to facilitate data sharing and collaboration and to prioritize investments.

## **Natural Resources Management and Planning**

### ***Ocean Planning***

Oregon's ocean planning efforts are governed by its Territorial Sea Plan, which provides a coordinated vision and approach for managing ocean resources within state waters. The plan provides a framework for governmental coordination around the implementation of Statewide Land Use Planning Goal 19 regarding Ocean Resources and the development of policy, including enforceable policies, for management of ocean resources and uses.

Updates to the state's Territorial Sea Plan are developed by the Ocean Policy Advisory Council and temporary working groups, approved by the Land Conservation and Development Commission, and are informed by robust stakeholder and partner engagement. The Oregon Coastal Management Program used this approach and other data and information to guide revisions to Part Three (Rocky Habitat Management Strategy), Part Four (Undersea Cables, Pipelines, and Utilities), and Part Five (Marine Renewable Energy Development)—all of which are complex issues which required thorough and thoughtful analysis, policy development, and public engagement.

In addition to the significant public scoping, outreach, and engagement, efforts to amend each part of the Territorial Sea Plan included topic-specific public processes. Revisions to Part Three, the Rocky Habitat Management Strategy, included development of a new community proposal process for rocky habitat that resulted in thousands of hours of community involvement and proposal development, as well as development and use of a collaborative and interactive mapping tool, known as Oregon SeaSketch, to inform their community-based proposals. Territorial Sea Plan Part Four, Uses of the Seafloor, included both a best practice study and a geological assessment of the ocean shore to explore site suitability for undersea cable installations. Both completed studies informed the public process in the development of new written evaluation requirements that provide clarity for the cable industry and guidance to regulatory agencies.

In addition to the Territorial Sea Plan, the program supported a range of additional offshore wind planning, data gathering, and engagement activities, including the staffing of and participation on a Bureau of Ocean Energy Management (BOEM) task force and preparations for future potential federal consistency review if BOEM's wind energy process moves forward. Offshore wind energy development has been both a source of high interest and concern within the state, particularly related to state and local involvement in the regulatory process via the state federal consistency review. Currently, the State of Oregon is trying to understand potential challenges and impacts, including considerations for fish and wildlife, viewsheds, city and county policies, and tribal consultation. To support these complex analyses, the program built OROWindMap in partnership with the West Coast Ocean Alliance Ocean Data Portal—one of many examples of a successful cross-regional partnership that the Oregon Coastal Management Program supports.

This work would not have been possible within existing resources. The Oregon Coastal Management Program was proactive in securing an Oregon Sea Grant policy fellow and a NOAA Project of Special Merit to create additional high-quality capacity within the program to successfully support this high-visibility effort. Even with the additional capacity this multiyear effort represented a significant workload and resulted in an impressive body of work that will have benefits for many years to come. It will help ensure that consideration of renewable energy off the Oregon coast is informed by a science-based approach that is informed by and considers the interests of state and local communities.

### ***Estuary Planning***

Oregon's statewide planning program works in partnership with local governments and state and federal agencies to establish comprehensive land use plans and balance competing uses. As part of Statewide Planning Goal 16, which is focused on estuarine resources, any jurisdiction with an estuary is required to have a detailed, special area management plan that governs estuarine resource conservation and development decisions. Most estuary plans were developed in the 1980s and have not been updated. Most plans do not adequately reflect tribal considerations, current conditions, or climate impacts. Oregon identified estuary resources as one of the state's high priorities in its current Coastal Zone Management Act Section 309 Assessment and Strategy. As part of this five-year strategy, the Oregon Coastal Management Program initiated a two-phase process to help jurisdictions across the state update these estuary management plans. Phase 1 was focused on improving the data quality, accessibility, extent, and mapping to ensure that plans are based upon the best available data and high-quality maps to inform important resource management planning and decision-making. This involved aligning county and city plans, digitizing maps, updating of policies and governing language around land use, and improving usability. Phase 2 is focused on inclusion of climate change impacts, sea level rise, and emerging uses data into the estuary plans.

Given the enormity of the challenge, the Oregon Coastal Management Program began by working closely with two local jurisdictions to update their plans. The program provided technical, financial, and planning support to modernize estuary management plans for Coos Bay and the Yaquina Bay and will use those efforts to inform guidance, standardized templates, and model ordinances that can support other jurisdictions seeking to update their plans. In Coos Bay, the program worked with local partners to identify components of the estuary plan that required updates. In Yaquina Bay, the program worked with the local counties, cities, and the Confederated Tribes of the Siletz Indians to update the estuary management plan, which also involved work to incorporate climate and coastal hazards considerations. In addition, the work in Yaquina Bay was supported by a Project of Special Merit award which will produce a guidance document on lessons learned that can help future communities update their estuary management plans.

Phase 1 is nearly complete in both Coos Bay and Yaquina Bay; however, progress was slower than anticipated due to the complex and time-intensive nature of the process and the additional COVID-related delays. The coastal program is currently seeking funding to work with six additional counties to update their estuary management plans and assist with the Columbia

River estuary with involvement from the State of Washington. NOAA recognizes the inclusive and highly collaborative approach during the initial pilot efforts, but encourages the program to identify opportunities to streamline and simplify the process where possible. Particularly as the lessons and processes from Phase 1 are translated into updated guidance and templates in Oregon's estuary planning guide, NOAA encourages the program to identify efficiencies that can expedite progress to update additional management plans in estuaries across the state. In addition, the program should explore opportunities to identify resources or incentives that would encourage and support local jurisdictions to update their estuary management plans.

Additionally, the Oregon Coastal Management Program is a leader in geospatial data and technologies with a long history in helping to develop, and now apply, the Coastal and Marine Ecological Classification Standard (CMECS). CMECS serves as an important data resource for estuary management plans and processes. During the evaluation period, the program made considerable progress to integrate new data into CMECS. During the last evaluation period, CMECS Phase 1 of 5 was completed, which resulted in maps with updated extent for all estuaries in Oregon except the Columbia. The program is nearing completion of Phase 2, which extends work to muddy flats. The Oregon Coastal Management Program is in the process of implementing CMECS Phases 3 (nearshore), 4 (Columbia), and 5 (kelp and seagrass), and products should be available by May 2024. The Oregon Coastal Management Program also contributed its expertise in this area to develop comprehensive coastal and marine data for the entire West Coast region. Their leadership role and technical assistance enabled development of regional CMECS data products for estuarine and nearshore habitats, in collaboration with the Pacific Marine and Estuarine Fish Habitat Partnership. This included regional products to reflect estuary extent, biotic and eelgrass habitat, wetland loss, and CMECS nearshore zones along the West Coast.

### **Findings for Natural Resources Management and Planning**

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its planning work through the Territorial Sea Plan, especially its efforts to update chapters to reflect current priorities and needs for rocky habitat management and undersea cables.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its national leadership in implementation of the Coastal and Marine Ecological Classification Standard.

**Accomplishment:** The Oregon Coastal Management Program is to be commended for its regional and national leadership roles in groups such as the West Coast Ocean Alliance, West Coast Ocean Data Portal, Coastal States Organization, Pacific Marine and Estuarine Fish Habitat Partnership, and many others. The Office for Coastal Management appreciates the program's role as leader, innovator, and expert in various ocean management topics and for promoting information transfer, sharing lessons learned, and providing technical assistance in adopting and implementing new approaches to management.

**Recommendation:** The NOAA Office for Coastal Management encourages the Oregon Coastal Management Program to use its current efforts and CZMA Section 309 strategy for Estuary Management Planning to reflect on lessons learned to identify efficiencies. The Office for

Coastal Management recommends that the program continue its work on the estuary planning guide and consider looking more broadly within the Department of Land Conservation and Development and the state for support and incentives for periodic, voluntary updates of local estuary management plans.



## Evaluation Metrics

Beginning in 2012, state coastal management programs began tracking their success in addressing three evaluation metrics specific to their programs. The evaluation metrics include a five-year target and provide a quantitative reference for each program about how well it is meeting the goals and objectives it has identified as important to the program. In 2018, coastal programs began a new five-year period and set targets specific to their programs for the coastal hazards performance measure and two additional performance measures from the Coastal Zone Management Performance Measurement System. The evaluation period covers a portion of both five-year evaluation metric cycles (year 5 of the first cycle and years 1 through 4 for the second cycle). A new set of evaluation metrics has been developed for the next five-year period.

### ***Evaluation Metrics: 2012–2017***

#### **Metric 1: Coastal Resource Protection**

**Goal:** Modern estuary management plans that accurately reflect current ecosystem, resource, and economic conditions.

**Objective:** By 2016, the Oregon Coastal Management Program will provide financial, technical, and information resources to targeted local governments to revise estuary management plans for deep draft development estuaries to incorporate and reflect current inventory information related to estuarine and shoreland habitats, uses, and conditions.

**Strategy:** A central focus of the Oregon Coastal Management Program is to ensure that planning and land use decisions made by program partners protect coastal resources such as estuaries and shorelands, as required by the statewide planning goals. Local estuary management plans are a critical tool to guide local decisions that protect estuarine and shoreland resources.

**Performance Measure:** The number of local estuary management plans for deep draft development estuaries that have been revised.

**Target:** One (1) estuary for which relevant local governments have revised and adopted updated provisions of an estuary management plan.

**Results:**

- Year 1 = 0
- Year 2 = 0
- Year 3 = 0
- Year 4 = 0
- Year 5 = 0

**Total = 0**

**Discussion:** Updating estuary management plans for deep draft estuaries can be a complex, expensive, and time-intensive process. However, during this evaluation period, work took place on two of the deep draft estuary management plans, which each requires the coordination of two cities and one county. Progress on the Coos Bay plan was delayed because of the COVID-19 public health emergency, but the coastal program expects Phase 1 to be complete soon. The consulting phase of the Yaquina Bay plan, funded by a NOAA Project of Special Merit award, was completed in August 2023. The next step is for the local jurisdictions to initiate the public hearings and adoption process.

## **Metric 2: Program Network**

**Goal:** Incorporation of all relevant changes to state statutes, administrative rules, and local government comprehensive plans and implementing regulations into the Oregon Coastal Management Program.

**Objective:** By 2017, the Oregon Coastal Management Program (OCMP) will submit 100% of high priority program changes from local government comprehensive plans and ordinances to the NOAA Office for Coastal Management for review and approval.

**Strategy:** The design of OCMP relies upon an integrated, effective network among all levels of government to support and carry out the mission of the program. The OCMP relies on enforceable policies in each local comprehensive plan and implementing regulations in their federal consistency review and determinations. As local jurisdictions periodically amend their local plans and regulations, these changes need to be submitted to NOAA as program changes for incorporation into OCMP's federally approved coastal program. Timely integration of changes to local and state agency partner plans and programs into the OCMP is vital to maintaining this effective network. The OCMP has been working closely with the Office for Coastal Management on developing a strategy and methodology for submitting a backlog of program changes for NOAA Office for Coastal Management approval and by July 1, 2012, OCMP will identify all unapproved program changes as high, medium, or low priority. Each local government program change will consist of a comprehensive submittal of all enforceable policy components of a jurisdiction's comprehensive plan and implementing regulations. It is anticipated that approximately 16 program changes will be designated as high priority.

**Performance Measure:** The number of program changes submitted to NOAA Office for Coastal Management for approval.

**Target:** Thirty-three (33) local government program change submittals.

**Results:**

- Year 1 = 3
- Year 2 = 5
- Year 3 = 6
- Year 4 = 8
- Year 5 = 5

**Total = 27**

**Discussion:** Although the target was missed, the program was able to complete many program changes during this time frame. Internal challenges, including staff turnover, contributed to this. As discussed in the “Natural Resources Planning and Management” section, there is great importance in completing program changes as new areas of ocean and estuary resource management emerge and existing areas require updates.

**Metric 3: Local Government Capacity**

**Goal:** Coastal communities with a high level of technical and professional capacity to support land use planning and coastal stewardship responsibilities.

**Objective:** By 2017, coastal local governments, with the support of Oregon Department of Land Conservation and Development (DLCD) staff, will have conducted 20 land use planning training sessions for staff and/or decision makers utilizing the OCMP video/digital training course.

**Strategy:** As a fully networked program, the capacity of local governments to fulfill their land use planning responsibilities is essential to the success of the Oregon Coastal Management Program. The OCMP places a high priority on providing technical and financial support to help build and sustain the land use planning capacity of our local government partners. DLCD coastal staff works closely with planning staff and elected officials in coastal cities and counties, as well as state agencies and the public, to provide advice and assistance in making planning decisions pursuant to the statewide land use planning goals and other requirements.

In April 2012, OCMP released a video training course on the Oregon land use planning system, with special emphasis on coastal management elements, targeted primarily at local government staff and lay decision makers (i.e., planning commissions and local governing bodies). This versatile product consists of nine chapters designed so that it can be used in a variety of settings and flexible session formats. The entire program consists of approximately two hours of running video time; with utilization of the other tools such as the discussion scenarios, a complete course would run from four to six hours in length. The entire product will be fully accessible online and will also be distributed to coastal local governments on portable media. OCMP staff will encourage and support (via coordination and technical assistance) local governments in organizing and sponsoring voluntary training sessions for local decision makers utilizing this tool in the manner deemed to be most effective for each community. Use of the tool will be quantified through local government reporting, and OCMP field staff will solicit qualitative feedback through attendance at training sessions and through other routine local government contacts.

**Performance Measure:** The number of local government land use planning training sessions conducted utilizing the OCMP online training course.

**Target:** Twenty (20) land use planning training sessions for local government staff and/or decision makers utilizing the OCMP online training course.

**Results:** Year 1 = 13  
Year 2 = 6  
Year 3 = 6  
Year 4 = N/A  
Year 5 = N/A

**Total = 25**

**Discussion:** While there were no online training courses provided in years 4 and 5, the coastal program exceeded the target for this metric of 20 courses. The coastal program previously had local governments report on this measure as part of their local planning assistance grants. The local planning assistance grants have been eliminated because of funding cuts. The coastal program continues to support the online training tool, and in several cases regional representatives have assisted in conducting local training sessions.

### ***Evaluation Metrics: 2018–2023***

#### **Metric 1: Coastal Hazards (CZMA Performance Measure 11b.)**

**Goal:** Increase resilience of coastal communities by strengthening plans, policies, and regulations related to coastal hazards.

**Objective:** By 2023, the OCMP will provide financial, technical, and information resources to local governments to update and strengthen plans, policies, and regulations related to coastal hazards.

**Strategy:** All local governments in Oregon’s coastal zone have in place comprehensive plans and are implementing land use regulations that address natural hazards. However, many of these plans and regulations have not been updated in some time, and therefore do not fully incorporate or address the most current data and information for coastal hazards. In particular, knowledge and documentation of the risk exposure from a Cascadia earthquake and ensuing tsunami has largely developed within the last decade. Likewise, the emerging understanding of increased risks associated with climate change and sea level rise represents new information that is not adequately addressed in many currently effective plans and regulations. Therefore, the resilience of Oregon’s coastal communities can be increased through the adoption of new and updated hazard elements of city and county comprehensive plans. To achieve this objective, the OCMP will provide technical and financial support to coastal local governments to strengthen plans, policies, and regulations addressing coastal hazards. Once adopted by the local government, these updated plans and regulations will be incorporated into the OCMP as program changes.

**Strategy:** By 2023, the OCMP anticipates a) 0 state-level policies and plans; b) 10 local-level policies and plans; c) 0 projects completed at the state-level; and d) 0 projects completed at the local-level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

**Performance Measure:** From 2018–2023, number of a) state-level policies and plans; b) local-level policies and plans; c) projects completed at the state-level; and d) projects completed at the local-level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

**Target:** From 2018–2023, ten (10) a) state-level policies and plans; b) local-level policies and plans; c) projects completed at the state-level; and d) projects completed at the local-level to reduce future damage from coastal hazards with assistance from CZM funding or staff.

**Results:**

- Year 1 = 27
- Year 2 = 21
- Year 3 = 12
- Year 4 = 7
- Year 5 = N/A

**Total to Date = 67**

**Discussion:** The coastal program exceeded the target for this metric. This evaluation findings document includes discussion of several examples of state-level and local-level policies and plans developed and state-level and local-level projects implemented that address the hazards of coastal storms, tsunamis, and climate change. The accomplishments highlight the successes in this area.

## **Metric 2: Coastal Hazards (CZMA Performance Measure 12a.)**

**Goal:** Improve the capability of coastal communities to manage coastal hazards through training in the use of coastal hazard data products.

**Objective:** By 2023, OCMP will provide funding and/or staff assistance to provide technical training to local practitioners and decision makers on the use of new coastal hazards data products.

**Strategy:** OCMP works closely with partner agency Department of Geology and Mineral Industries (DOGAMI) to develop new coastal hazard data products. This work is focused on producing data products that can be used by local communities to improve planning and decision making related to coastal hazards. Examples of these data products include updated coastal erosion zone mapping and least-cost-distance (LCD) tsunami evacuation modeling. The development of these products will continue to be a priority for OCMP over the 5-year period.

Because these data products are technical in nature, providing training in their appropriate use and deployment is essential to leveraging full value from this work. As new hazard data products are developed, OCMP will actively engage with coastal communities to provide structured training to local staff and decision makers in the use of this information for planning, policy development, and decision making.

**Performance Measure:** From 2018–2023, number of training events related to coastal hazards offered by OCMP.

**Target:** From 2018–2023, twelve (12) training events related to coastal hazards offered by the OCMP.

**Results:**

- Year 1 = 10
- Year 2 = 5
- Year 3 = 5
- Year 4 = 2
- Year 5 = N/A

**Total to Date = 22**

**Discussion:** The program has met its target by the second year of reporting.

**Metric 3: Government Coordination and Decision Making (CZMA Performance Measure 4a.)**

**Goal:** Improve coordination among program partners through comprehensive “CZM 101” training.

**Objective:** By 2023, OCMP will provide staff support for comprehensive “CZM 101” training for program partners.

**Strategy:** As an extensively networked program, a clear understanding of relevant authorities and agency roles and responsibilities among our program partners is essential to the success of the OCMP. The department regularly conducts training for program partners on specific topics related to the administration and implementation of the OCMP. Frequently, these trainings are conducted as a part of our semiannual network meetings.

The OCMP has in the past conducted comprehensive “CZM 101” training events which have been well attended and positively received by program partners. However due to resource limitations, these trainings have not been offered for several years. During this time, there has been substantial change in personnel among our partner agencies at all levels, including management, line staff and, in the case of local governments, elected and appointed decision makers. In many cases, new personnel have limited background in the structure of the CZMA and the OCMP. The resultant knowledge gap among our critical partners presents an opportunity to substantially enhance the effectiveness of the OCMP through a focused,

comprehensive training effort aimed at imparting a clear understanding of program authorities, roles, and responsibilities. In addition to the topic-specific trainings offered through our network meetings, the department will focus on offering one or more comprehensive “CZM 101” trainings during the reporting period.

**Performance Measure:** From 2018–2023, number of training events related to Government Coordination offered by the OCMP.

**Target:** From 2018–2023, twenty-five (25) training events related to Government Coordination offered by the OCMP.

**Results:**

- Year 1 = 19
- Year 2 = 6
- Year 3 = 31
- Year 4 = 26
- Year 5 = N/A

**Total to Date = 82**

**Discussion:** The coastal program far exceeded the target for this metric. Recipients of this training included local planning commission members, elected officials, practitioners, and interested members of the public. Additionally, many Oregon Coastal Management Program staff have conducted topic-specific training with local governments and state agency staff on topics ranging from federal consistency to tsunami resilience planning.

## Conclusion

For the reasons stated herein, I find that Oregon is adhering to the programmatic requirements of the Coastal Zone Management Act and its implementing regulations in the operation of its approved Oregon Coastal Management Program.

These evaluation findings contain five recommendations. Recommendations must be considered before the next regularly scheduled program evaluation but are not mandatory at this time. Recommendations that must be repeated in subsequent evaluations may be elevated to necessary actions.

This is a programmatic evaluation of the Oregon Coastal Management Program that may have implications regarding the state's financial assistance awards; however, it does not make any judgment about or replace any financial audits.

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Jeffrey L. Payne, PhD  
Director, NOAA Office for Coastal Management

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Date



## Appendix A: Response to Written Comments

### Stacey Detwiler, Oregon Policy Senior Program Manager Wild Salmon Center

Ms. Detwiler submitted extensive comments on approval of the coastal program's Nonpoint Pollution Control Program. Ms. Detwiler first provided an overview of the history of the program. Next, Ms. Detwiler discussed the nexus between the Nonpoint Pollution Control Program and agricultural nonpoint source management. She provided a summary of concerns that NOAA and EPA had with enforcement and focus areas for agricultural nonpoint source management. Ms. Detwiler suggests that "NOAA should consider how Oregon has demonstrated since the 2016 evaluation that it is reliably and adequately managing nonpoint source pollution from agricultural lands to protect natural resources within the coastal zone."

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Ms. Detwiler for the extensive comments. The evaluation findings address the Nonpoint Pollution Control Program and provide a recommendation for OCMP to work with leadership across all relevant state agencies to raise awareness of impacts of the financial implications related to the current disapproval status of the state's Coastal Nonpoint Source Pollution Control Program. Also, the recommendation is to continue to track next steps and be prepared and responsive to whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval (with the goal of the Department of Environmental Quality and Department of Land Conservation and Development programs being fully funded again).

### Alex Sifford, Retired Watershed Council Manager Neskowin, Oregon

Mr. Sifford commented in support of the coastal program. Specifically, he stated that NOAA should "1) re-approve it, 2) increase its funding, and 3) stop penalizing the OCMP by NOAA and the EPA for water quality violations due to upstream forest practices . . ."

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Mr. Sifford his comments. The purpose of this evaluation is not to determine whether the program will be reapproved but rather to review implementation and enforcement of its federally approved coastal management program, its adherence to the terms of the federal financial assistance awards, and whether it is addressing coastal management needs identified in Section 303(2)(a) through (K) of the CZMA. It is also an opportunity to highlight program accomplishments and provide recommendations to improve program implementation. The evaluation findings do specifically address the Nonpoint Pollution Control Program and provide a recommendation for OCMP to work with leadership across all relevant state agencies to raise awareness of impacts of the financial implications related to the current disapproval status of the state's Coastal Nonpoint Source Pollution

Control Program. The recommendation also is to continue to track next steps and be prepared and responsive to whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval (with the goal of the Department of Environmental Quality and Department of Land Conservation and Development programs being fully funded again).

**Philip Ratcliff, Citizen  
Salem, Oregon**

Mr. Ratcliff commented that the coastal program is critical and that it needs additional capacity to address climate change.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Mr. Ratcliff for his comments. The evaluation findings identify the need for additional program capacity under the “Program Administration” section and provide two recommendations to improve funding or staff capacity.

**Stan Zitnik, Citizen  
Depoe Bay, Oregon**

Mr. Zitnik wrote in support of the coastal program. He expressed the importance of federal plans complying and being consistent with state plans. Mr. Zitnik noted that any plans should address climate change and coastal and marine resource preservation and should be developed in cooperation with community input.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Mr. Zitnik for his comments. The program has made great strides toward improving federal consistency. The evaluation findings (see “Federal Consistency” section) highlight program accomplishments and provide a recommendation to look for opportunities to build staff capacity and sustainability for the federal consistency program to continue improvements.

**McKenzie Purdom, Citizen**

Ms. Purdom wrote in support of the coastal program and provided several points as to why the coastal program is important. She stated that the coastal program provides essential support for local planners, updating of estuary management plans, and tackling of climate hazards. Ms. Purdom also commented on the challenges of integrating natural climate solutions into coastal planning and the challenge of integration of land use planning. Finally, Ms. Purdom commented on the need for the coastal program to be fully funded.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Ms. Purdom for her comments. The evaluation findings address the Nonpoint Pollution Control Program and provide a recommendation for OCMP to work with leadership

across all relevant state agencies to raise awareness of impacts of the financial implications related to the current disapproval status of the state’s Coastal Nonpoint Source Pollution Control Program. The recommendation also is to continue to track next steps and be prepared and responsive to whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval (with the goal of the Department of Environmental Quality and Department of Land Conservation and Development programs being fully funded again).

**Ed Joyce, PhD**  
**Clatsop Community College**

Dr. Joyce commented on the impacts of global warming and the need to develop alternative sources of energy. He stated that implementation of offshore wind energy will result in local environmental disturbances, such as cables crossing beaches. Dr. Joyce called for “all hands on deck” to address warming.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Dr. Joyce for his comments. The evaluation findings, in the “Ocean Planning” section, highlight the efforts that the program has undergone to prepare for offshore wind energy. The program is commended for its work on the Territorial Sea Plan, and a recommendation is provided to continue to explore the need for additional program capacity and resources for emerging offshore ocean uses, such as participating in offshore wind planning, siting, and review.

**Jane Rincon, Citizen**  
**Florence, Oregon**

Ms. Rincon wrote in support of the coastal program and raised the issue of European beachgrass impacting nesting habitat of snowy plovers. Ms. Rincon expressed hope that the coastal program will address this issue.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Ms. Rincon for her comments. Through this comment, the program will be made aware of this issue.

**Sara Schreiber, Citizen**

Ms. Schreiber wrote in support of the coastal program and provided several examples of how the coastal program supports local planners—updating of estuary management plans and addressing climate resilience and the challenge of integrating natural climate solutions within coastal planning. She also mentioned the challenge of integrating land use planning with protection of species and habitats. Ms. Schreiber ended her comments with a plea for a fully funded coastal program.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Ms. Schreiber for her comments. The evaluation findings address the Nonpoint Pollution Control Program and provide a recommendation for OCMP to work with leadership across all of the relevant state agencies to raise awareness of impacts of the financial implications related to the current disapproval status of the state’s Coastal Nonpoint Source Pollution Control Program. Also, the recommendation is to continue to track next steps and be prepared and responsive to whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval (with the goal of the Department of Environmental Quality and Department of Land Conservation and Development programs being fully funded again).

**Sandra N. Roumagoux, Citizen  
Newport, Oregon**

Ms. Roumagoux commented with strong support for the coastal program, with particular interest in promoting updates for Oregon’s Estuary Management Plans. She stated that the coastal program “needs a strong framework for guiding local governments (including ports) through comprehensive planning and needs funding and capacity to provide support.”

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Ms. Roumagoux for her comments. In the “Estuary Planning” section of the evaluation findings, a recommendation is provided to encourage the Oregon Coastal Management Program to use its current efforts and Section 309 strategy for estuary management planning to reflect on lessons learned to determine where efficiencies may be gained. The Office for Coastal Management recommends that the program continue its work on the estuary planning guide and consider looking more broadly within the Department of Land Conservation and Development and the state for support and incentives for periodic, voluntary updates.

**Shannon Mabie, Citizen**

Ms. Mabie commented about the many areas in which the coastal program supports local planners—updating estuary management plans, addressing climate resilience and the challenges of natural climate solutions, and integrating land use planning with the protection of species and habitats. Ms. Mabie also noted the importance of a fully funded coastal program and stated that the penalties must stop.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Ms. Mabie for her comments. In the “Estuary Planning” section of the evaluation findings, a recommendation is provided to encourage the Oregon Coastal Management Program to use its current efforts and CZMA Section 309 strategy for Estuary Management Planning to reflect on lessons learned to determine where efficiencies may be gained. The Office for Coastal Management recommends that the program continue its work on the estuary planning guide, and consider looking more broadly within the Department of Land Conservation and Development and the state for support and incentives for periodic, voluntary updates. The

evaluation findings also address the Nonpoint Pollution Control Program and provide a recommendation for OCMP to work with leadership across all relevant state agencies to raise awareness of impacts of the financial implications related to the current disapproval status of the state's Coastal Nonpoint Source Pollution Control Program. Also, the recommendation is to continue to track next steps and be prepared and responsive to whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval (with the goal of the Department of Environmental Quality and Department of Land Conservation and Development programs being fully funded again).

**Jasso Thomas, Citizen**

Jasso Thomas commented on pollutants in streams and noted that there needs to be stronger policy to fine or arrest persons doing harm.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank them for their comments.

**Phillip Johnson, Conservation Director  
Oregon Shores Conservation Coalition  
Coos Bay, Oregon**

Mr. Johnson provided extensive comments on the coastal program. He stated that the coastal program plays an essential role in the management of Oregon's coastal resources, both in supporting land use planning by local governments and in coordinating the network of local and state agencies. Mr. Johnson noted that updates to the estuary management plans are vitally necessary as the current plans are about 40 years old. Mr. Johnson also highlighted challenges that the coastal program faces, such as climate change, invasive species, water pollution, habitat and biodiversity loss, development, and restoration strategies. Mr. Johnson commented that the coastal program needs more capacity to address these challenges. One recommendation that Mr. Johnson noted was to fully fund the coastal program.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Mr. Johnson for his extensive comments. In the "Estuary Planning" section of the evaluation findings, a recommendation is provided to encourage the Oregon Coastal Management Program to use its current efforts and CZMA Section 309 strategy for Estuary Management Planning to reflect on lessons learned to determine where efficiencies may be gained. The Office for Coastal Management recommends that the program continue its work on the estuary planning guide and consider looking more broadly within the Department of Land Conservation and Development and the state for support and incentives for periodic, voluntary updates. The evaluation findings also address the Nonpoint Pollution Control Program and provide a recommendation for OCMP to work with leadership across all relevant state agencies to raise awareness of the impacts of the financial implications related to the current disapproval status of the state's Coastal Nonpoint Source Pollution Control Program. Also, the recommendation is to continue to track next steps and be prepared and responsive to

whatever agency actions are needed to get the nonpoint program resubmitted to NOAA and EPA for approval (with the goal of the Department of Environmental Quality and Department of Land Conservation and Development programs being fully funded again).

**Lydia Deane, Citizen**

Ms. Deane commented that she would “hate to see her achievements negated now,” referring to Marguerite Neustrom Watkins. Ms. Watkins was active in shoreline protection in Coos Bay. Ms. Deane’s comment equates the work of the coastal program with that of Ms. Watkins.

**NOAA Office for Coastal Management Response:** The Office for Coastal Management would like to thank Ms. Deane for her comments.