



February 25, 2025

Rep. Ken Helm and Rep. Mark Owens
Co-Chairs, House Committee On Agriculture, Land Use, Natural Resources, and Water

Re: HB 2925 (Support)

Co-Chairs Ken Helm and Mark Owens and Honorable of the Committee

On behalf of Oregon chapter network, our greater membership and thousands of Oregon supporters and volunteers, the Surfrider Foundation would like to express our support and considered amendments to HB 2925 - a bill to improve and streamline ocean shore permitting. In particular, the intention of HB 2925 to expedite and clarify the permitting processes for projects that benefit restoration and recreation of the ocean shore are paramount to the State's ability to protect public beaches. We have included some friendly amendment recommendations at bottom which we think will help better guide rulemaking and public engagement.

In Oregon, the beaches belong to the people. Our entirely public shoreline is one of the state's most treasured features, a vital legacy we can leave to future generations. Yet our public beaches are at risk, caught in the "coastal squeeze," between rising sea levels and coastal development. Beach erosion and a currently rigid system of management responses are shrinking beaches in Oregon - which is leading to the eventual loss of public access and recreation along the shore.

For the state of Oregon to manage this public resource into the future, Oregon Parks and Recreation Department must evolve their ocean shore permitting system and provide a greater range of opportunity and direction for projects and activities that benefit restoration and recreation of the ocean shore. HB 2925 and the associated rulemaking will also help ensure that emergency activities and projects of the ocean shore are, in fact, temporary, and can thus be replaced by better-designed alternatives that are more protective of ecosystems and communities. Opening up a greater range of options, process and direction for permitting restoration, wildlife management and recreation associated activities will better ensure Oregon's public beaches are accessible and enjoyed by future generations.

Surfrider Foundation is a grassroots, non-profit environmental organization dedicated to the protection and enjoyment of our world's ocean, waves and beaches. Our Oregon chapter network comprises thousands of supporters and volunteers throughout the state organized among our 5 distinct coastal chapters in Oregon. A key initiative of our work is beach protection and as HB 2925 has key implications for the management of Oregon's beaches (ocean shore) we have a significant interest. As coastal residents, we live adjacent to one of our state's most valuable economic and ecological resources, the beach and ocean. To

preserve that resource, the associated economic and social benefits and the public's right to access and recreate on our ocean shore, we must adapt our outdated permitting process and associated management tools. We encourage your yes vote on HB 2925 and consideration of these suggested amendments:

Suggested Amendments (in red)

The first two support our interest to ensure section 3 (d) doesn't become a categorical exemption and is not abused or interpreted to allow for unexpected activities. The last is a recommendation is for providing comment on applications as we discussed prior to general authorizations.

Page 4 LINE 14 -

SECTION 3. (1) Notwithstanding ORS 390.640, the State Parks and 19 Recreation Department may, consistent with the policy in ORS 390.610 20 and standards in ORS 390.655, establish by rule a general authorization 21 permit for improvements on the ocean shore if the department deter 22 mines that the activities subject to the permit are substantially simi 23 lar in nature, **have effects that are predictable** and:

Page 4, LINE 21 -

(d) **Other similar activities** that cause no more than temporary or minimal impact to the ocean

Page 4 Line 32 - insert additional numbered public notice clause

The department may require public notice and comment period prior to issuing an authorization for an action under a general permit where it believes such a requirement would be in the public interest. The procedure for such notice and comment period shall be outlined by the department when it creates the general permit.

Sincerely,



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