

**From:** [Angela Horgan](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** April 14 meeting Action Items 3a & 3b  
**Date:** Monday, April 13, 2026 9:35:08 AM

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You don't often get email from [angelamh1869@gmail.com](mailto:angelamh1869@gmail.com). [Learn why this is important](#)

Dear Members of the State Land Board and Department of State Lands Staff,

I am writing on behalf of the Macadam Bay Homeowners Association in opposition to DSL's proposed submerged land lease pricing changes under Division 82. As president of an HOA representing a floating home community, I can tell you that this proposal will have real and lasting impacts on our residents and others like us across the state.

Costs for maintaining a floating home, in addition to the maintenance of infrastructure and the steep price of insurance, already make this a more expensive way of life for a community. Additional DSL costs would challenge a lot of our older neighbors who have been on our moorage for decades and live on a fixed retirement income.

Beyond the likely increase in costs, we believe that this proposal relies on a flawed valuation method. Using the Real Market Value of upland property to price submerged land does not make sense. Submerged land simply does not have the same utility as upland property — you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent produces unjust outcomes that bear no relationship to the actual value of the land being leased.

This flawed approach is already producing extreme, unsustainable lease increases — in some cases many times higher than current rates. These are not manageable adjustments. They threaten the viability of long-standing floating home communities and waterfront uses that have been part of Oregon's landscape for generations.

The proposal attempts to correct for these extremes by adding minimum payments and a capped maximum lease rate, but this only underscores the problem. The system is no longer based on true market value at all. Lower leases are pushed up to a floor while higher leases are capped, creating an inconsistent and inequitable framework. Over time, the cap will cause properties of vastly different sizes to pay the same lease amount regardless of how much land they occupy, eliminating any pretense of fairness.

Perhaps most concerning, DSL staff have not provided a fiscal impact analysis despite repeated requests from the Rules Advisory Committee (RAC.) The Land Board is being asked to approve a major policy change without understanding its real-world consequences. The RAC was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact on communities like ours.

This is about more than lease rates. It is about fairness, equity, and protecting floating home communities, affordable housing options, river-dependent businesses, and Oregon's working waterfront. Our residents chose this way of life and have invested in maintaining their homes and our shared waterway responsibly. They deserve a rational, transparent, and equitable process.

I urge the Land Board to pause this proposal and require a thorough fiscal impact analysis, meaningful engagement with affected communities, and a valuation approach

that reflects the actual nature and value of submerged land before moving forward.

Respectfully,

Angela Horgan, PhD, RD  
President, Macadam Bay Homeowners Association

**From:** [Donna Matrazzo](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Opposed to proposed DSL submerged land lease pricing changes  
**Date:** Monday, April 13, 2026 8:30:25 AM

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You don't often get email from [matrazzo@msn.com](mailto:matrazzo@msn.com). [Learn why this is important](#)

To: State Land Board

I am writing in opposition to DSL's proposed submerged land lease pricing changes. As a floating home owner, I am concerned at the effects this proposal will have real and lasting impacts on my aging community since it would force our moorage to raise rental rates at a time/age when most of our residents are on fixed incomes

The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does not have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is unrealistic and leads to unjust outcomes—they threaten the viability of long-standing waterfront uses. The proposal attempts to correct itself by adding minimum payments and a capped maximum lease rate. In reality, this means the system is no longer based on true market value at all. Lower leases are pushed up to a minimum, while higher leases are capped—resulting in an inconsistent and inequitable system.

Over time, the cap will cause properties of different sizes to pay the same lease amount, regardless of how much land they occupy. This eliminates fairness and creates long-term inequity.

Even more concerning, DSL staff have not provided a fiscal impact analysis, despite repeated requests from the RAC. The State Land Board is now being asked to approve a major policy change without understanding its real-world consequences.

The DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.

I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

Sincerely,  
Donna Matrazzo  
Mayfair Moorage

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Donna Matrazzo

15500L NW Ferry Rd. Slip #14  
Sauvie Island  
Portland OR 97231  
cell (503) 705-5048  
(503) 621-3049

**From:** [Carole Yann](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Written Testimony to DSL submerged Land Lease  
**Date:** Monday, April 13, 2026 8:21:37 AM

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You don't often get email from carole.moses@gmail.com. [Learn why this is important](#)

I am writing in opposition to DSL's proposed submerged land lease pricing changes. As a floating home owner this proposal will have real and lasting impacts on my community.

The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does *not* have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is not realistic and leads to unjust outcomes.

This flawed valuation method is already producing extreme, unsustainable lease increases, in some cases many times higher than current rates. These are not manageable adjustments—they threaten the viability of long-standing waterfront uses.

- The proposal attempts to correct itself by adding minimum payments and a capped maximum lease rate. In reality, this means the system is no longer based on true market value at all. Lower leases are pushed up to a minimum, while higher leases are capped—resulting in an inconsistent and inequitable system.

Over time, the cap will cause properties of different sizes to pay the same lease amount, regardless of how much land they occupy. This eliminates fairness and creates long-term inequity.

Even more concerning, DSL staff have not provided a fiscal impact analysis, despite repeated requests from the RAC. The State Land Board is now being asked to approve a major policy change without understanding its real-world consequences.

The DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.

I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

Thank you for your time.

Carole Yann

**From:** [Kevin Hunt](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Agenda Item 3A  
**Date:** Monday, April 13, 2026 8:21:23 AM

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You don't often get email from kevinh@portlandpackagingco.com. [Learn why this is important](#)

In regard to The State Land Board Meeting of April 14<sup>th</sup>, 2026, Rules for waterway leases, licenses, and registrations, I oppose the Boards Initiative to the rulemaking for administrative rules in OAR 141-082 for the following reasons and concerns.

The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does *not* have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is not realistic and leads to unjust outcomes. Further, the DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.

I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

Respectfully,

Kevin Hunt  
Concerned Constituent

**From:** [Courtney Frisse](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Submerged land lease pricing changes  
**Date:** Monday, April 13, 2026 8:17:22 AM

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You don't often get email from courtneyfrisse@gmail.com. [Learn why this is important](#)

To the DSL landboard:

I am in strong opposition to the proposed submerged land lease pricing which I find excessive, extreme, and based on flawed valuation. I live on a houseboat at a small moorage. These increases will have a significant impact on the residents here who are almost all retired and on fixed incomes. Many of us moved here decades ago in our search for affordable housing. Many of us have had pursuits in the arts, and have added to the cultural richness of Portland. This moorage struggles to keep costs down to keep it affordable. Should we have to sell our homes here, we are NOT going to enjoy the kind of appreciation homeowners on land in Portland have enjoyed over the past decades. The points below are valid. Please pause this lease pricing proposal for more study, transparency, and a more equitable solution.

Sincerely,  
Courtney Frisse  
Houseboat #13  
Mayfair Moorage  
15500U NW Ferry Rd.  
Portland, OR 97231

- I am writing/speaking in opposition to DSL's proposed submerged land lease pricing changes. As a [*floating home owner/marina operator/waterfront business/river user*], this proposal will have real and lasting impacts on my community.
- The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does *not* have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is not realistic and leads to unjust outcomes.
- This flawed valuation method is already producing extreme, unsustainable lease increases, in some cases many times higher than current rates. These are not manageable adjustments—they threaten the viability of long-standing waterfront uses.
- The proposal attempts to correct itself by adding minimum payments and a capped maximum lease rate. In reality, this means the system is no longer based on true market value at all. Lower leases are pushed up to a minimum, while higher leases are capped—resulting in an inconsistent and inequitable system.
- Over time, the cap will cause properties of different sizes to pay the same lease amount, regardless of how much land they occupy. This eliminates fairness and creates long-term inequity.
- Even more concerning, DSL staff have not provided a fiscal impact analysis, despite repeated requests from the RAC. The State Land Board is now being asked to approve a major policy change without understanding its real-world consequences.
- The DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.
- I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

**From:** [Kelly Butler Holtz](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** REVISED Opposition to Division 82 Waterway Lease Rule Adoption (Agenda Item 3.a)  
**Date:** Monday, April 13, 2026 9:52:33 AM

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You don't often get email from kbholtzoyc@gmail.com. [Learn why this is important](#)

Dear Governor Kotek, Secretary of State Read, and Treasurer Steiner,

I am writing as both a floating home owner and the President of the Waterfront Organizations of Oregon (WOOO) to express serious concerns about the Department of State Lands' proposed changes to submerged land lease pricing.

At the center of this proposal is the use of the Real Market Value (RMV) of adjacent upland property to determine the cost of submerged land leases. This is a fundamentally flawed approach. Submerged land does not have the same utility as upland—it cannot be walked on, driven on, or developed in the same way. Treating submerged land as if it has the same value as upland property is not grounded in reality and leads to distorted, unjust outcomes.

We are already seeing the consequences. In some cases, this methodology results in extreme, unsustainable increases in lease costs—orders of magnitude above current rates. This is not a reasonable adjustment; it is a destabilizing shift that puts long-standing waterfront communities and river-dependent uses at risk.

Equally concerning is the lack of transparency in how this proposal has been developed.

Members of the Rules Advisory Committee repeatedly requested basic information necessary to evaluate the impacts of these changes, including comparisons to current lease rates, a range of lease outcomes, and a clear distribution of costs. DSL representatives apologized for the omissions; however, they have still not provided the requested information.

Additionally, DSL committed to conducting a fiscal impact analysis. That analysis has not been shared. Without it, decision-makers and stakeholders alike are being asked to consider a major policy change without a clear understanding of its real-world consequences.

The proposal also attempts to correct its own shortcomings by imposing minimum payments and a capped maximum lease rate. In practice, this means the system is no longer based on true market value at all. Instead, it relies on artificial floors and ceilings that undermine both fairness and consistency.

Taken together, this is not a credible valuation framework. It is a flawed methodology that produces inequitable outcomes, lacks transparency, and fails to provide the information necessary for informed decision-making.

I respectfully urge you to take a hard look at this proposal and require a more rational, transparent, and equitable approach before moving forward.

Thank you for considering this very important matter.

Sincerely,  
Kelly Butler Holtz  
President, Waterfront Organizations of Oregon (WOOO)

Sent from my iPhone

**From:** [Marilyn Zornado](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** DSL Proposed Submerged Land Lease Pricing Changes  
**Date:** Sunday, April 12, 2026 10:57:15 PM

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You don't often get email from zornado@gmail.com. [Learn why this is important](#)

**REGARDING:** *Adopt updated rules that implement best management practices to protect the health and safety of Oregon-owned waterways and achieve sustainable operations. The rules govern leases, licenses and registrations for structures and uses on state-owned submerged and submersible land, such as marinas, ports, docks, and floating homes. Rules include fees, compensation, insurance requirements, and other minor updates.*

My husband and I are retired. We live on a floating-home at Marina Way Moorage, 13140 NW Marina Way, Portland, Or 97231. This has been our home since 1990.

We understand that the updated rules will create increases that are projected to be 150% of the current rates, with 5% increases each year, and renewal fees each 5 years. **DSL staff have not provided a fiscal impact analysis. This process has not been transparent.**

These increases will be a hardship for us and for our floating home community. We live on Social Security supplemented by part-time work. Two-thirds of our moorage residents are also retired.

I urge you to not adopt these updated rules. Re-evaluate these increases to protect not just us, but other floating home communities, river businesses and Oregon's working waterfront.

Marilyn Zornado

From: Jody Scheer, Bridgeview Moorage  
14956 NW Mill Road  
Portland, Oregon 97231

To: Division of State Land Board Members  
Re: Opposition to the Submerged Land Lease pricing changes

Dear State Lands Board Members:

I am writing in opposition to the DSL's proposed submerged land lease pricing changes that will have lasting negative impacts on my houseboat community. I have lived in a houseboat for 45 years on Multnomah Channel and became a marina owner 40 years ago with 11 of my neighbors when our moorage fell into bankruptcy, and we self-managed our community during bankruptcy proceedings, until we were able to buy it at sheriff's sale in 1986.

Our community held corporation has run our moorage for 40 years, making substantial improvements over time to improve safety and livability. All 29 of our floating homes pay rent to our corporation and our community is one of great diversity and longevity. We have a lot of senior citizens on fixed incomes and a facility that is over 100 years old with infrastructure that is due for hefty and expensive upgrades and repairs. Using self-management and doing much of the maintenance work ourselves, our corporation has been able to keep our rents affordable, but as our sewer, water and marina systems have aged, we are now faced with economic hardship.

The currently proposed steep increases in State Land Leases will severely affect our bottom line and will increase housing instability for up to a third of our moorage residents. These proposed new underwater lease rates will place an undue burden on our community, and we ask that they be moderated to more manageable levels.

Thank you for your consideration of our concern,

Sincerely,

Jody Scheer  
Resident and Co-Owner, Bridgeview Moorage on Multnomah Channel

**From:** [Melissa Marsland](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Water lease rate increase rates  
**Date:** Sunday, April 12, 2026 8:34:14 PM

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You don't often get email from melissamarsland@gmail.com. [Learn why this is important](#)

- I am writing in opposition to DSL's proposed submerged land lease pricing changes. As a *floating home owner and shareholder in a moorage*, this proposal will have real and lasting impacts on my aging community. We have been around for more than 50 years, and we still have a few residents who date back to then. Most of us (29 houses) have been here for 40+ years because this was the affordable housing for those of us without resources or bank credits.

This proposal would force our moorage to raise rental rates at a time/age when most of our residents are on fixed incomes, some barely making rent (which we have kept low 2 to 3% increases most years, none during Covid).

- The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does *not* have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is unrealistic and leads to unjust outcomes—they threaten the viability of long-standing waterfront uses.
- The proposal attempts to correct itself by adding minimum payments and a capped maximum lease rate. In reality, this means the system is no longer based on true market value at all. Lower leases are pushed up to a minimum, while higher leases are capped—resulting in an inconsistent and inequitable system.
- Over time, the cap will cause properties of different sizes to pay the same lease amount, regardless of how much land they occupy. This eliminates fairness and creates long-term inequity.
- Even more concerning, DSL staff have not provided a fiscal impact analysis, despite repeated requests from the RAC. The State Land Board is now being asked to approve a major policy change without understanding its real-world consequences.
- The DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.
- I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

Sincerely

Melissa Marsland

Bridgeview Moorage

14920 NW Mill Road

Portland, OR. 97231

**From:** [Lori Brock](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Opposition to proposed submerged land lease pricing changes.  
**Date:** Friday, April 10, 2026 10:26:37 AM  
**Attachments:** [Screenshot 2025-04-15 at 8.20.42 PM.png](#)

You don't often get email from lori@brockdesigngroup.com. [Learn why this is important](#)

- I am writing in opposition to DSL's proposed submerged land lease pricing changes. As a floating home owner, this proposal will have real and lasting impacts on my community.
- The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does *not* have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is not realistic and leads to unjust outcomes.
- This flawed valuation method is already producing extreme, unsustainable lease increases, in some cases many times higher than current rates. These are not manageable adjustments—they threaten the viability of long-standing waterfront uses.
- The proposal attempts to correct itself by adding minimum payments and a capped maximum lease rate. In reality, this means the system is no longer based on true market value at all. Lower leases are pushed up to a minimum, while higher leases are capped—resulting in an inconsistent and inequitable system.
- Over time, the cap will cause properties of different sizes to pay the same lease amount, regardless of how much land they occupy. This eliminates fairness and creates long-term inequity.
- Even more concerning, DSL staff have not provided a fiscal impact analysis, despite repeated requests from the RAC. The State Land Board is now being asked to approve a major policy change without understanding its real-world consequences.
- The DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.
- I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

Please review this information more carefully before making any determinations.

Lori Brock  
Columbia Ridge Marina



Lori Brock / Brock Design Group

[www.brockdesigngroup.com](http://www.brockdesigngroup.com)

503-348-3701 / [Lori@BrockDesignGroup.com](mailto:Lori@BrockDesignGroup.com)

**From:** [Harkins, Stephen](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Subject: Opposition to Action Item 3. a.: Div 82 Rules for Waterway Leases, Licenses and Registration in its current form  
**Date:** Friday, April 10, 2026 9:23:59 AM

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You don't often get email from s.harkins@northeastern.edu. [Learn why this is important](#)

**Subject: Opposition to Action Item 3. a.: Div 82 Rules for Waterway Leases, Licenses and Registration in its current form**

Dear Governor Kotek, Secretary of State Read, and State Treasurer Steiner,

I am writing to make the case that DSL's proposal to use Real Market Value (RMV) as the basis for setting lease charges for submerged land is fatally flawed. To set the RMV for the submerged land, DSL proposes to calculate the per square foot cost for the upland associated with the lease based on its RMV and then to use this value as the per square foot cost for the mud. That is, DSL claims that the value of a square foot of the submerged land (mud) is the same as a square foot of land, even though land obviously has much greater utility than mud (e.g., building on land is much easier than building on mud, you can walk on land, park on it, drive on it). When RAC members strongly argued against this false equivalence, DSL's response was that they were committed to using RMV. While it may make sense for DSL to use RMV to establish charges for leases on land, it makes absolutely no sense to do so for mud. In fact, the state of Washington uses a formula just like DSL's to calculate lease costs for submerged land, but they discount the value of the mud by 70%.

Not surprisingly, using DSL's method for calculating lease costs produces exorbitant lease costs for the higher cost leases. It's not clear why DSL has chosen to make this change. In 2024 and 2025, the Common School Fund made record-setting contributions to Oregon's schools. As of February 2025, the Common School Fund was worth \$2.38 billion. Thus, it seems as though the current system is working well.

In any event, to deal with the exorbitant lease charges produced by the change to RMV, DSL has proposed a cap for lease costs at \$150,000. This cap will help high-cost lease holders, but it also creates another problem. Over time, as property values continue to climb, the high-cost leases will stop increasing at \$150,000, the cap, while the charges for the other leases will continue to climb, leading, at the limit, to everyone paying \$150,000. For example, currently one floating home moorage leases about three times more mud than its neighbor and pays about three times more for its lease. Under DSL's proposal, after several cycles, the two moorages will each end up paying \$150,000 even though one moorage is leasing three times more mud than the other. Thus, this approach eliminates any semblance of equity.

DSL's plan also doesn't accommodate low-cost leases. In one of their meetings, DSL informed the RAC that the median lease cost using the proposed approach was the

minimum payment. That is, up to half of the lease charges produced by DSL's approach are so low that DSL doesn't use the calculated lease numbers but rather must impose a minimum payment that is greater than the lease cost that DSL's approach yields.

The result is that DSL is not actually using RMV as the basis for their proposal. The lower-cost leases are paying the minimum payment set by DSL, not the calculated lease charge for their property. The higher-cost leases (and, at the limit, everyone) are also not paying the lease cost calculated for their property. They are paying the \$150,000 cap imposed by DSL.

It would make much more sense to not use RMV at all and to just do what DSL has already suggested for the first two 15-year lease cycles. That is, as DSL proposes, the lease cost could be increased by 15% in the first year of the lease renewal followed by 3% increases for 14 years, and the same could be done in the second lease cycle: 15% increase in the first year and 14 3% increases for the next 14 years. Assuming that this process begins as leases renew in 2027, DSL could assess progress in 2054 and decide what they would like to propose for 2057. In the meantime, this approach provides a consistent and growing revenue stream for DSL and expense predictability for the leaseholders for the next 30 years.

Thank you,

Steve Harkins, West Hayden Island Moorage, Slip 2,

508-527-9178



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# OPOA Legal Center

(503) 620-0258

[www.oregonpropertyowners.org](http://www.oregonpropertyowners.org)

April 7, 2026

Oregon State Land Board  
Department of State Lands  
775 Summer St. NE, Suite 100  
Salem, OR 97301-1279

Re: Technical Amendment, Division 82 Rules

Governor Kotek, Secretary Read, Treasurer Steiner:

Thank you for the opportunity to comment on Action Item 3a on your April 14 agenda concerning adoption of updated Division 82 rules for the Department of State Lands.

We appeared during the rulemaking proceedings before the agency to express concern with the draft language concerning floating recreational cabins and the use of stiff booms in conjunction with a cabin. We testified that the draft language created unintended consequences that were inconsistent with existing agency practice and the need to use stiff booms as a primary method of protecting cabins from floating debris and wave damage.

Based upon public testimony and current agency practice, the Department made minor changes to the proposed draft rules to fully address our concerns. We are very appreciative and supportive of the Department's willingness to work with stakeholders to address these concerns.

In the final draft before you, however, it appears that the Department missed a tie between two particular rules that could result in confusion for both the Department and the public. The proposed applicable subsections are OAR 141-082-0265(3)(b) and OAR 141-082-0335(1)(d).

OAR 141-082-0265(3)(b) requires the owner of a floating recreational cabin that is 1,500 square feet or less to obtain a registration with the Department for use of the cabin on state owned submerged and submersible land. The rule expressly excludes the square footage of a stiff boom or shear boom from the determination of the size of the cabin. This was the primary focus of our comments made during the public comment period, and we are very supportive of the staff's willingness to clarify that stiff booms and shear booms are not intended to be counted in the calculation of the square footage of the cabin, consistent with current agency practice. We fully support this language.

OAR 141-082-0335(1)(d) creates a \$1,000 registration fee for a floating recreational cabin that is 1,500 square feet or less, and specifically excludes pilings, dolphins, mooring buoys and protective booms from the square footage calculations in determining the square footage of the floating recreational cabin. We fully support the fee and the proposed amount. What is missing from this exclusion language is reference to stiff booms and shear booms. This appears to be an oversight.

The result of the failure to mention stiff booms and shear booms in the fee section of OAR 141-082-0335(1)(d) is a lack of clarity. Specifically, the draft rules make clear that stiff booms and shear booms aren't included in the square footage calculations to determine whether the owner of a floating recreational cabin must obtain a registration from the Department. But when the fee to obtain that registration is calculated, there is no mention of excluding stiff booms or shear booms from the size determination of the floating recreational cabin.

In short, the square footage calculations in the registration section did not carry over to the square footage calculations in the fee section, which creates confusion if uncorrected. We believe this was oversight and not intended.

The solution to this issue is simple and uncontroversial and would change neither the policy nor the amount of any fees collected by the Department. Including a reference to stiff booms and shear booms in the exclusion language in the fee section (OAR 141-082-0335(1)(d)) will harmonize the fee section with the registration section and eliminate the slight difference between the two subsections. We hope that the Board will consider making this change.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read "D. Hunnicutt", written in a cursive style.

David J. Hunnicutt

**From:** [Maree Piplovick](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Department of State Lands' proposed changes to submerged land lease pricing  
**Date:** Wednesday, April 8, 2026 8:46:41 AM

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You don't often get email from mareepip@yahoo.com. [Learn why this is important](#)

**I am writing in opposition to DSL's proposed submerged land lease pricing changes.**

As a floating homeowner, this proposal will have real and lasting impacts on my community.

The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does *not* have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is not realistic and leads to unjust outcomes.

This flawed valuation method is already producing extreme, unsustainable lease increases, in some cases many times higher than current rates. These are not manageable adjustments—they threaten the viability of long-standing waterfront uses.

The proposal attempts to correct itself by adding minimum payments and a capped maximum lease rate. In reality, this means the system is no longer based on true market value at all. Lower leases are pushed up to a minimum, while higher leases are capped—resulting in an inconsistent and inequitable system.

Over time, the cap will cause properties of different sizes to pay the same lease amount, regardless of how much land they occupy. This eliminates fairness and creates long-term inequity.

Even more concerning, DSL staff have not provided a fiscal impact analysis, despite repeated requests from the RAC. The State Land Board is now being asked to approve a major policy change without understanding its real-world consequences.

The DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.

I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

Thank you,

Maree Piplovick  
Columbia Ridge Marina  
18525 NE Marine Drive, Slip E7  
Portland, OR 97230

**From:** [Suzanne De Groot](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Land lease  
**Date:** Monday, April 13, 2026 9:43:35 AM

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You don't often get email from [suzanne.degroot44@gmail.com](mailto:suzanne.degroot44@gmail.com). [Learn why this is important](#)

Dear Oregon State Land Board,

I am writing in opposition to the proposed submerged land lease pricing changes. I am a floating home owner on the Mayfair Moorage on the Willamette Channel, and am hoping to soon be buying a share in the moorage. Given this, I have a vested interest in this issue.

Living on a floating home in the Portland area is considered by many to be a more affordable alternative to the high costs of home ownership in a real estate market that is difficult for many people to afford. So, many of us wouldn't be able to afford real estate in the area and rely on the relative affordability of floating home moorages.

However, this historic reality has been threatened in the last few years, and is further threatened by this price change/increase. Floating homes have costs that land-based homes don't, namely fees to maintain the moorage structure - including the submerged land lease. The cost this adds already threatens to make floating home living unaffordable for many of us.

In a real estate market that is trying to figure out ways to keep people in their homes, I think more serious consideration should be paid to the impact the proposed price changes will have on moorages. I understand DSL staff have not yet provided an analysis, effectively asking the State Land Board to make a decision without knowing how this impacts the people it affects.

The DSL Rules Advisory Committee needs to be provided with the data needed to properly evaluate this proposal before it can even begin to assess the proposal's impact. This seems like a basic requirement without which evaluation and decision making is based on guessing.

This, added to the questionable system of caps and minimums proposed, which apparently attempt to modify the inequity of a system based on Real Market Value of upland property leading to vastly inequitable outcomes, makes me urge you to pause this process and require a more informed, transparent, and equitable approach to your decision making. This affects an entire population of home owners, who deserve to have decisions that affect them taken with more care.

Suzanne De Groot

**From:** [Cara Newman Ruyle](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Opposition to Land lease price changes  
**Date:** Monday, April 13, 2026 9:58:50 AM

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You don't often get email from [newmanruyle@me.com](mailto:newmanruyle@me.com). [Learn why this is important](#)

Dear Oregon State Land Board,

I am writing in opposition to the proposed submerged land lease pricing changes. I am a floating home owner on the Mayfair Moorage on the Willamette Channel, and am hoping to soon be buying a share in the moorage. Given this, I have a vested interest in this issue.

Living on a floating home in the Portland area is considered by many to be a more affordable alternative to the high costs of home ownership in a real estate market that is difficult for many people to afford. So, many of us wouldn't be able to afford real estate in the area and rely on the relative affordability of floating home moorages.

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Sincerely,

Cara Newman Ruyle

Mayfair Moorage, Inc. homeowner

**From:** [morgan.madrid](mailto:morgan.madrid)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Water lease rate increase  
**Date:** Monday, April 13, 2026 10:00:00 AM

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[You don't often get email from pinkhouseboat@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

People of the State Lands Board:

I only learned of the likely increase in water lease fees a few minutes ago. I'm sure there are better arguments for and against.

The popular idea of houseboats as a showplace and occasional retreat for the well off is true in places but completely misleading for older moorages.

My own current houseboat is a kit built on a raft thirty years ago. I moved to this moorage forty years ago. Many residents have been here as long.

It is a community of mutual support. Coexisting with the natural environment and also using fewer social services.

This place has evolved. It was not intentionally created as a retirement community but that is what it has become.

I am a semi-retired handyman. I have put up grab bars, steps, ramps for neighbors. And personally cared for a landscaper with cancer and a lab technician with dementia. I cannot afford to stop working.

Some residents have done well. Some have struggled. Most are now retired. One messed up his paperwork and has lost much of his social security.

I'm saying that this is a place that works. And while I'm resigned to inflation and working until I drop, every new rule or change threatens a way of life that is rare.

Thank you.

Morgan Madrid  
Bridgeview Moorage  
503-957-4237

**From:** [RICHARD RUYLE](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Fwd: Opposition to Land lease price changes  
**Date:** Monday, April 13, 2026 10:01:31 AM

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You don't often get email from campruyle@aol.com. [Learn why this is important](#)

Sent from my iPhone

Begin forwarded message:

**Date:** April 13, 2026 at 9:58:44 AM PDT  
**To:** landboard.testimony@dsl.oregon.gov  
**Subject:** Opposition

Dear Oregon State Land Board,

I am writing in opposition to the proposed submerged land lease pricing changes. I am a floating home owner on the Mayfair Moorage on the Willamette Channel, and am hoping to soon be buying a share in the moorage. Given this, I have a vested interest in this issue.

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home owners, who deserve to have decisions that affect them taken with more care.

Sincerely,

Richard Ruyle

Mayfair Moorage, Inc. homeowner

**From:** [Salli Archibald](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Opposition to proposed cost increase of submerged land increase .  
**Date:** Monday, April 13, 2026 10:11:44 AM

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[You don't often get email from [salli.archibald@gmail.com](mailto:salli.archibald@gmail.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Passing the increased price of submerged land would eliminate housing affordability for us & most of our neighbors here on the Willamette slough & for other older people who live in houseboats all over the Portland area. Please do not pass this increase.

Sincerely,

Salli & Dale Archibald

**From:** [Monica Fetzer](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Proposed Division of State Land submerged land lease pricing changes  
**Date:** Monday, April 13, 2026 10:12:03 AM

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You don't often get email from mmfetzer@gmail.com. [Learn why this is important](#)

Dear Oregon State Land Board,

I am writing in opposition to the proposed submerged land lease pricing changes. I am a floating home owner on the Mayfair Moorage on the Willamette Channel, and am hoping to soon be buying a share in the moorage. Given this, I have a vested interest in this issue.

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Sincerely,

Monica Fetzer

Mayfair Moorage, Inc. homeowner

**From:** [JaneJ](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Submerged Land Lease  
**Date:** Monday, April 13, 2026 10:12:45 AM

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You don't often get email from roadrash@wingsnstrings.com. [Learn why this is important](#)

I am writing in opposition to the proposed (outrageous) price increase.

This proposal has a minimum and a maximum....in other words the little guys are subsidizing the big guys.

\$500-\$1000 renewal fee? Why?

Thanks for your reconsideration of this devastating proposal.

Jane Jeffries  
Sauvie Island floating home owner

**From:** [J Michael Albrich](#)  
**To:** [Alice Schillerberg](#); [DSL Landboard Testimony \\* DSL](#)  
**Subject:** DSL submerged land lease proposal  
**Date:** Monday, April 13, 2026 10:12:59 AM

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You don't often get email from mayfair.moorage@gmail.com. [Learn why this is important](#)

Dear Landboard,

I am writing in opposition to DSL's proposed submerged land lease pricing changes. As a floating home owner and shareholder in a moorage, this proposal will have real and lasting impacts on my aging community. We have been around for more than 50 years, and we still have a few residents who date back to then. Most of us (29 houses) have been here for 40+ years because this was the affordable housing for those of us without resources or bank credits.

This proposal would force our moorage to raise rental rates at a time/age when most of our residents are on fixed incomes, some barely making rent (which we have kept low 2 to 3% increases most years, none during Covid).

- The proposal relies on using the Real Market Value (RMV) of upland property to price submerged land. This valuation method is fundamentally flawed. Submerged land does not have the same utility as upland—you cannot walk on it, drive on it, or develop it in the same way. Treating the two as equivalent is unrealistic and leads to unjust outcomes—they threaten the viability of long-standing waterfront uses.
- The proposal attempts to correct itself by adding minimum payments and a capped maximum lease rate. In reality, this means the system is no longer based on true market value at all. Lower leases are pushed up to a minimum, while higher leases are capped—resulting in an inconsistent and inequitable system.
- Over time, the cap will cause properties of different sizes to pay the same lease amount, regardless of how much land they occupy. This eliminates fairness and creates long-term inequity.
- Even more concerning, DSL staff have not provided a fiscal impact analysis, despite repeated requests from the RAC. The State Land Board is now being asked to approve a major policy change without understanding its real-world consequences.
- The DSL Rules Advisory Committee was not provided with the basic data needed to evaluate the proposal, including comparisons with current lease rates and a full range of examples. This lack of transparency makes it impossible to assess the true impact.

· I urge the Land Board to pause this proposal and require a more rational, transparent, and equitable approach before moving forward.

Our Moorage is currently negotiating the sale of the Moorage to 14 of our 17 homes. At Mayfair Moorage on the Multnomah Channel the people who live here will soon OWN the Moorage where they live. They are, in some cases, going into debt to accomplish this. The purchase is a financial strain for all. The dollar increases contemplated for residential communities living on the river will create yet another expense delaying or preventing similar moorage purchases.

Sincerely,

J. Michael Albrich MD  
President, Mayfair Moorage Inc.  
15500 NW Ferry Rd, unit Z  
Portland, OR 97231  
cell: 503-998-7615

**From:** [Lynn Corwin](#)  
**To:** [DSL Landboard Testimony \\* DSL](#)  
**Subject:** Proposed submerged land lease pricing changes  
**Date:** Monday, April 13, 2026 10:13:12 AM

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You don't often get email from lynncorwin1@gmail.com. [Learn why this is important](#)

· I am writing in opposition to DSL's proposed submerged land lease pricing changes. As a floating home owner and shareholder in a moorage, this proposal will have real and lasting impacts on my aging community. We have been around for more than 50 years, and we still have a few residents who date back to then. Most of us (29 houses) have been here for 40+ years because this was the affordable housing for those of us without resources or bank credits.

This proposal would force our moorage to raise rental rates at a time/age when most of our residents are on fixed incomes, some barely making rent (which we have kept low 2 to 3% increases most years, none during Covid).

Thank you,

Lynn Corwin