



Permitting and Mitigation in Oregon's Wetlands and Waters (Division 85)

RAC Meeting # 6 Summary

August 6, 2025; 9:00 a.m.

Overview

The Permitting and Mitigation in Oregon's Wetlands and Waters (Division 85) Rulemaking Advisory Committee was convened by the Oregon Department of State Lands (DSL) on August 6, 2025, via Zoom. The RAC was convened to provide input on proposed amendments to the administrative rules governing permitting and mitigation in wetlands and waters.

RAC Members and Attendance

Name	Affiliation	Present?
Members		
Becky Kreag	Board Member, The Wetlands Conservancy	X
Brad Livingston	Wetlands Program Lead, Oregon Department of Transportation	X
Brian Cook	Permitting Program Manager, Clean Water Services	X
Dana Kurtz	Senior Environmental Scientist, Anderson Perry	
Emily Alcott	Principal Ecologist & Fluvial Geomorphologist, Interfluve	
Jesse Steele	Executive Director, Grande Ronde Model Watershed	
Jonas Moiel	Senior Ecologist / Principal, Green Banks, LLC	X
Julia Bond	Alternate for Kaitlin Lovell, City of Portland	X
Katie Ryan	Alternate for Becky, Wetland Conservancy	
Mackenzie Butler	Alternate for Emily Alcott, Interfluve	
Marnie Keller	Environmental Services Programs Manager, Cow Creek Band of Umpqua Tribe of Indians	X
Michael Martin	League of Oregon Cities	X
Melissa Brown	Alternate for Julia Bond, City of Portland	
Ron Wierenga	Deputy Director, Clackamas Water Environment Services (Association of Oregon Counties representative)	X
Sue Brady	Alternate for Dana Kurtz, Anderson Perry	X
Staff		
Dana Hicks	Department of State Lands	
Danielle Boudreaux	Department of State Lands	X
Grey Wolf	Department of State Lands	X
Jane Rombouts	Department of State Lands	X

Melody Rudenko	Department of State Lands	X
Charles Rendon	Department of State Lands	X
Daniel Evans	Department of State Lands	X
Jevra Brown	Department of State Lands	X
Jessica Salgado	Department of State Lands	X
Advisors		
Joy Lovett	Advisor Land Use and Waterway Alterations Coordinator, Oregon Department of Fish and Wildlife (ODFW)	
Shelley Tattam	Advisor 401 Program Project Manager, Department of Environmental Quality (DEQ)	X

Welcome and Introductions

Samantha Meysohn, a facilitator from Kearns & West, welcomed participants to the sixth meeting of the Rulemaking Advisory Committee (RAC) for Permitting and Mitigation in Oregon's Wetlands and Waters. She highlighted the purpose of the meeting, which was to review the RAC comment tracker, the fiscal impact, the racial equity statement guidelines, and the need for the rules, and finalize the input from RAC members on Division 85 rules. DSL staff, RAC members, and technical advisors then introduced themselves and shared their affiliations and roles.

Agenda Review; Zoom Protocols

Samantha provided an overview of the [meeting agenda](#) and reviewed Zoom protocols, including chat usage and technical support instructions. Meeting materials were shared via email prior to the session and can also be found on the rulemaking website:

<https://www.oregon.gov/dsl/pages/rulemaking.aspx>.

Review of the RAC Comment Tracker

Samantha introduced the comment tracker section and shared that DSL wanted to circle back to the questions, comments, and concerns raised by RAC members and provide their rationale for the final set of rule recommendations. Samantha noted that if there was continued disagreement with the rule language during the discussion, those perspectives would be captured in the meeting summary. Samantha also reminded participants of the upcoming public comment period this fall, which will provide an additional opportunity to submit comments and suggestions.

Elevation-Based Estuary Extent Model and Determining Tidal Extent

Daniel Evans, DSL, responded to a question from RAC Meeting 2 regarding the definition of "highest measured tide." He explained that the definition had been expanded to allow for an additional reporting option using the Elevation-Based Estuary Extent Model (EBEEM). Daniel clarified that the rule does not specify a hierarchy for determining highest measured tide in the field, in order to support a range of mapping approaches and accommodate varying site conditions. Daniel noted that while firm

data from a gauge is always preferred and may be requested by DSL staff, the rule language was kept flexible to reflect the diversity of field scenarios.

He also addressed a question about the use of the term “extent” in the rule language. DSL determined that the word would remain in use, as it describes the mapping of estuary boundaries and aligns with the EBEEM model name. Additionally, other state agencies, including the Department of Land Conservation and Development (DLCD), are using the same terminology, which supports consistency across agencies.

There were no questions or comments from RAC members regarding this section.

State Scenic Waterways Related Definition

Jess Salgado, DSL, responded to a question about how the term “related adjacent lands” is defined in the rules, noting that the current language felt vague. Jess explained that the definition was added to Division 85 in order to align with Division 100.

She shared that the original language in Division 100 was based on statutory definitions from ORS 390, which relates to Oregon Parks and Recreation Department (OPRD) statutes concerning scenic waterways. DSL included the definition in Division 85 because the term is explicitly referenced within the definition of state scenic waterways. Jess emphasized that the language is based directly on statute.

There were no questions or comments from RAC members regarding this section.

Jess then addressed a related comment suggesting that agency designations beyond OPRD, such as the Department of Environmental Quality’s (DEQ) Outstanding Resource Waters, be included in the rule language. Jess clarified that the original intent of the rule change was to align with statute and Division 100, not to expand DSL’s jurisdiction. She noted that DSL will consider using more inclusive language to reflect all relevant agency designations.

In reviewing DEQ’s Outstanding Resource Waters, Jess shared that only three waters are currently included: Waldo Lake, Crater Lake, and the North Fork Smith River. Of those, Waldo Lake and the North Fork Smith River are already subject to DEQ’s zero cubic yard threshold for permitting, as they are either designated state scenic waterways or essential salmon habitat. Jess noted that only one of the three resources is not currently captured in the existing definitions.

There were no questions or comments from RAC members regarding this section.

Tidal River Definition

Daniel Evans, DSL, responded to questions about the term “tidal rivers,” noting it was added to align with existing references to “tidal waters” for consistency. He clarified that there is no separate definition for “tidal rivers” in rule, and DSL does not plan to create one.

Daniel explained that DSL’s jurisdiction is defined by statute, which limits “tidal waters” to areas within estuaries up to the highest measured tide line. While freshwater sections of rivers like the Columbia and Willamette experience tidal activity, they fall outside this statutory definition. DSL chose not to expand the definition to include all tidal areas to remain consistent with Oregon statute.

There were no questions or comments from RAC members regarding this section.

ARSC Definition

Daniel responded to a question about how cold water habitat is defined under Aquatic Resources of Special Concern (ARSC). He explained that guidance is currently available in Appendix B of DSL's Removal-Fill Guide, which includes information on each ARSC type.

Daniel explained that cold water habitat is based on DEQ's definition of Core Cold Water Habitat Use. DSL relies on DEQ's mapped data, which includes areas like mountain streams that meet the required temperature thresholds. Daniel shared that DSL is in the process of developing more detailed abstracts for each ARSC, including cold water habitat. These will be made publicly available to support consultants in the field. He also noted that DSL may consider revising its terminology to include the word "core" in order to better align with DEQ's language during finalization of the abstracts.

There were no questions or comments from RAC members regarding this section.

Habitat Restoration Definition

Charles Rendon, DSL, addressed comments regarding the terms "restoration" and "improvement" as used in the rule. He explained the distinction between these terms in the context of voluntary habitat projects versus compensatory mitigation. Charles clarified that restoration and improvement in mitigation refer to required actions under the compensatory mitigation section of the rule, whereas the proposed changes refer to voluntary habitat restoration and improvement.

He described that currently, DSL distinguishes restoration from improvement, which may include infrastructure-related work such as bank hardening or road maintenance. Restoration projects qualify for reduced application requirements, including less detailed delineation and function and value assessments. Improvement projects require full protocol assessments. The rule change would collapse restoration and improvement into a single category for voluntary habitat projects. This would allow DSL to apply greater flexibility in waiving some application requirements for all voluntary habitat improvements, simplifying the process.

Members had the following questions and comments:

- One member expressed that they needed additional time to fully digest the information presented. However, they voiced overall support for the proposed change, stating that it seemed like a positive development.

Charles provided additional clarification about the term "restoration," particularly in relation to mitigation. He specified that the agency distinguishes between compensatory mitigation and voluntary habitat restoration, which affect application requirements and permitting differently. Currently, voluntary habitat work is divided into restoration, which focuses solely on habitat-related activities such as stream re-meandering and wood placement, and improvement, which may include infrastructure-related activities and requires a higher level of application detail. The proposed rule changes aim to allow both voluntary restoration and improvement projects to use a simplified level of delineation and functions and values assessment.

Members had the following questions and comments:

- One member sought clarification on definitions of "enhancement," "restoration," and "improvement." They expressed concern that "restoration" might limit facilitation of projects

that provide functional enhancement but do not meet the strict restoration definition. They encouraged the facilitation of enhancement projects that fall outside the restoration definition.

- *Response: The term “restoration” has different meanings in different contexts. In compensatory mitigation, “restoration” specifically means returning a site to its historic aquatic condition. “Voluntary habitat restoration” refers to improving existing habitat functions without necessarily restoring it to a historic state. The proposed rule changes focus on easing requirements for voluntary habitat restoration and improvement projects by allowing reduced delineation and assessment details, without changing definitions related to compensatory mitigation.*
- Another RAC member shared that the use of “restoration” for different contexts remains confusing. They suggested that adding clarifying words or terms might help reduce confusion, though they acknowledged that changing terminology across all related rules would be difficult.
 - *Response: The term “habitat restoration” has been used in the rules for decades and that we are not introducing new terms but rather tweaking the definition to broaden its scope beyond the narrow compensatory mitigation meaning. The restoration community broadly views restoration as any beneficial habitat project. The intent of the change is to make permitting easier for these projects without affecting compensatory mitigation requirements.*
- A RAC member confirmed understanding that compensatory mitigation restoration projects require a higher standard of documentation, while voluntary restoration projects have more flexible documentation requirements. *Response: Under Compensatory Mitigation “restoration” is used alone; under Voluntary section, it is used in combination with habitat, “habitat restoration”. We are simplifying the voluntary section with no change to the mitigation section*
- One RAC member commented on the terminology used for voluntary habitat improvement. They suggested using a different word instead of “voluntary improvement” because they found the current wording confusing.

Stormwater Systems and Municipal Ponds

Daniel addressed a question raised during a RAC meeting regarding whether exemptions for stormwater systems and municipal ponds would be included under the voluntary habitat restoration rules. Daniel clarified that these activities are not considered part of voluntary habitat restoration and therefore are not included in that section of the rule. He explained that exemptions for certain stormwater systems and municipal ponds are covered under a separate administrative rule (OAR 141-085-5157).

He confirmed that no changes are proposed to the exemption rules for stormwater systems and municipal ponds as the current rule section under discussion applies solely to habitat restoration work.

Members had the following questions and comments:

- One member asked for clarification on whether stormwater systems and municipal ponds are exempt and why they are not included under voluntary habitat restoration.

- *Response: These features are already exempt under a different administrative rule (OAR 141-085-5157) and are not part of voluntary habitat restoration, which focuses on activities like stream meandering and large wood placement. Some ponds may be delineated but are non-jurisdictional and therefore do not require removal-fill permits.*
- *Response: There is a need for clarification distinguishing between jurisdiction, whether DSL regulates a feature, and exemptions, whether a permit is required if regulated. Some ponds are not jurisdictional, so no exemption is needed, while others may be jurisdictional but have existing exemptions.*

Highest Measure Tide Definition

Daniel addressed a question regarding the application of the highest measured tide line versus the ordinary high water line. He explained that tidal influence extends from the ocean into freshwater portions of rivers, which can cause confusion about where each jurisdictional line applies.

Daniel clarified that, according to statute and rule, the highest measured tide line is used only within the estuary. Specifically, in the Columbia River, this boundary is at the western edge of Puget Island. Beyond the head of tide, the jurisdictional line switches from the highest measured tide to the ordinary high water line. He also noted that head of tide documentation for major coastal rivers in Oregon is publicly available through GIS data on the DSL website.

There were no questions or comments from RAC members regarding this section.

Daniel then addressed the final question related to highest measured tide. He acknowledged the complexity caused by tidal actions occurring in both freshwater and saltwater systems. However, he explained that current rules limit jurisdictional discussion to the estuary as defined in Oregon Revised Statutes.

The comment made during a RAC meeting raised a suggestion to incorporate tidal activity explicitly into freshwater definitions to acknowledge tidal influence in those systems. Daniel stated that while this is a valuable idea, it is beyond the scope of the current Division 85 update. DSL plans to consider this topic in a future rule update. He emphasized the importance of maintaining consistency across DSL documents and avoiding conflicting definitions about tides, which influenced the decision not to address the issue in the present rulemaking.

There were no questions or comments from RAC members regarding this section.

Freshwater Tidal Definition Daniel addressed the four comments received concerning the highest measured tide, noting that they all revolved around similar themes. He specifically pointed out a suggestion to include freshwater tidal definitions within the intermittent freshwater rule, referring to Section 5.5.15, subsection 3, as a relevant part of the text. Daniel expressed that this was an important idea that deserves thoughtful consideration. However, he emphasized that before any changes can be proposed, DSL must conduct a thorough and comprehensive review of all related documents and literature to ensure consistency across all rule language and definitions. Given the limited timeframe for the current rule update, this review and potential change will be deferred to a future rulemaking process to allow adequate time for careful evaluation and alignment.

Members had the following questions and comments:

- A RAC member expressed support for expanding the definition of tidal waters to include freshwater systems as well as saltwater. They noted that tidal freshwater rivers have unique functions even without salt influence and highlighted the complexity of the salt wedge, where freshwater can overlay saltwater at different depths. The member emphasized that these factors should be considered in the rule update.

Essential Salmonid Habitat Designation

Daniel addressed questions made during the third RAC meeting regarding the stream function assessment method (SFAM), and its relationship with Essential Salmonid Habitat (ESH). A comment during a previous RAC meeting raised concern that if ESH mapping does not encompass all life cycle stages of the salmonid species on the list, then the model might be incomplete. Daniel clarified that the agency's interaction with ESH is guided strictly by the statutory definition. The rule aligns directly with this definition, which limits ESH to the habitat necessary to prevent depletion of indigenous and anadromous salmonid species during their spawning and rearing life stages. The stream function assessment model is designed to prioritize increasing value scores for stream reaches that meet this statutory definition. Although there was a question about covering all life cycle stages and locations, the agency's scope is limited to spawning and rearing reaches as defined by statute.

There were no questions or comments from RAC members regarding this section.

Daniel then reiterated that the agency follows the statutory definition of ESH to guide its actions. He explained that locations not currently mapped as ESH have simply not yet been determined by ODFW to meet the statutory criteria for spawning or rearing habitat. The ESH map is updated annually, incorporating new information from restoration projects such as tide gate removals that have created new reaches with demonstrable spawning and rearing activity. Daniel emphasized that DSL actively seeks input from tribes and the public year-round regarding new locations where data may support inclusion in the ESH designation. Additionally, Daniel clarified a concern about function and value scores: the ESH designation affects only the value score in the assessment model, while the function scores are determined independently, based solely on physical indicators and are not influenced by the presence or absence of ESH mapping.

There were no questions or comments from RAC members regarding this section.

Definition for Hardening

Melody Rudenko, DSL, addressed comments which related to the addition in the rule regarding projects that add hardening or act to harden stream banks and the associated mitigation requirements. She explained that through extensive dialogue, that a RAC member had provided a clear definition of hardening was developed to address concerns that stream enhancement projects aimed at stabilizing banks might unintentionally be classified as hardening if the term was not well defined. The proposed definition describes hardening as removal or fill actions within waters of the state that do not enhance stream function and are intended to permanently restrict stream channel migration either laterally or vertically at the project site. She acknowledged additional suggestions to consider the geomorphic context of vertical and lateral vibration. DSL plans to adopt a hardening definition following a review process to ensure there are no unintended impacts elsewhere in the rule. This review will take place over the next month before the rule with the hardening definition is released for public comment in October.

There were no questions or comments from RAC members regarding these sections.

Melody continued the discussion on the topic of hardening. She clarified that the mitigation requirement for hardening a stream is intended to apply only to new material being added to streams, acknowledging that many streams already contain existing material that has altered them. To reflect this intention clearly, the draft rule has been updated to specify that the mitigation requirement applies to new material. This revised language will be included in the version of the rule released for public comment. Melody expressed appreciation for the comment that helped improve the clarity of the rule.

There were no questions or comments from RAC members regarding these sections.

New Principal Objective to Increase Wetlands Through Creation and Restoration

Grey Wolf, DSL, addressed two related comments regarding Section 680 of the rule, which covers the principal objectives and general requirements of compensatory mitigation. The current proposal from DSL is to add a principal objective focused on increasing wetland resources through restoration and creation. The comments received suggested the language includes the phrase "where appropriate," recognizing that not all areas of the state, such as urban systems or locations without a history of wetlands, may be suitable for restoration or creation projects. Grey acknowledged this feedback and stated that DSL will seriously consider including "where appropriate" in the updated rule language. However, before finalizing this addition, DSL will conduct another internal review to assess any possible ripple effects of adding this language, although none are currently anticipated.

There were no questions or comments from RAC members regarding this section.

Enhancement and Wetland Loss

Grey addressed three related comments concerning Section 694 of the rule, which outlines special requirements for the use of enhancement and preservation as compensatory mitigation. The discussion focused particularly on the proposed addition under this section stating that enhancement shall not reduce Oregon's resource base of wetlands and areas experiencing disproportionate wetland loss. The comments asked how DSL will determine the geographic boundaries for identifying areas of disproportionate wetland loss. Grey acknowledged the validity of this concern and responded that if the rule is changed as proposed, DSL will develop guidance on how to identify these locations. Additionally, they plan to explore including a section in their annual report to discuss wetland losses. Overall, DSL recognizes the importance of providing clear criteria and will work on guidance that will aim to identify some key considerations for determining disproportionate wetland loss.

There were no questions or comments from RAC members regarding this section.

Self-Sustaining Requirement for Mitigation Release

Grey addressed five related comments concerning the concept of "self-sustaining" in compensatory mitigation projects. These comments reflected thoughtful input from knowledgeable participants who understood the complexities of permitting and mitigation on the landscape. The discussion focused on Section 710 of the rule, which outlines monitoring requirements for compensatory mitigation projects. DSL had initially proposed adding language to require that mitigation sites be self-sustaining and to allow DSL to request additional monitoring or updated plans if a site was not self-sustaining. However, RAC comments received during RAC meeting #5 raised concerns about the lack of a clear, cohesive

definition for “self-sustaining” and noted that some systems are intentionally dynamic rather than static. Grey acknowledged these concerns and stated that DSL will likely propose to remove the self-sustaining requirement from the rule due to the ambiguity surrounding the term.

There were no questions or comments from RAC members regarding this section.

Mitigation Bank Definition

Grey explained that this section was referencing comments related to the proposed update to the definition of “Mitigation Bank” in the rule. DSL was aiming to update the definition by referencing the correct statute and adding a sentence to describe how a bank functions within the Removal-Fill program. The comment focused on one specific phrase in the new sentence: “reasonably expected adverse impacts.” The commenter suggested removing the words “reasonably expected,” noting they were unnecessary and did not add value. DSL agreed with this feedback, acknowledging that “reasonably expected” is vague and lacks statutory significance. As a result, DSL is considering removing that phrase from the definition in the proposed rule.

There were no questions or comments from RAC members regarding this section.

Restoration and Creation Guidance

Grey shared that this comment was about DSL’s proposed addition to the section on mitigation banking purpose and policies, specifically subsection 730 (4)(c). The new language would state that mitigation banks should increase wetland resources through restoration and creation in areas with cumulative wetland loss. While this addition is meant to emphasize the importance of restoring wetland functions, commenters raised a concern about the need to include some limitation—suggesting that restoration and creation should only happen where appropriate. In response, DSL is considering adding the phrase “where appropriate” to the end of that subsection to reflect this feedback and ensure the rule provides appropriate guardrails.

There were no questions or comments from RAC members regarding this section.

Samantha noted that this section marked the conclusion of the responses that DSL had prepared. She emphasized that DSL had aimed to be thorough and comprehensive in working through the comments they received, especially in areas where they had committed to doing additional review and consideration. Samantha also reminded the group that since this was their final meeting together, DSL wanted to make sure they had effectively addressed everyone’s comments and questions throughout the Division 85 rulemaking process. She asked members if there were any rules that they had hoped to discuss at the meeting or any topics that needed to be revisited.

Members had the following questions and comments:

- A RAC member raised concerns about DSL serving as both the approver and operator of the in-lieu fee program, questioning how well sites are being managed, whether projects are actually being developed, and if the funding formula used is adequate.
 - *Response: We have discussed these concerns internally and plan to meet with the Wetlands Conservancy to explore improvements. While these discussions may not occur before the public comment period ends, DSL emphasized their interest in collaborating on solutions to reduce temporal loss and get funds on the ground more quickly.*

- One RAC member noted a confusing phrase in the rule text under Section 750-21(c), which appeared to suggest either multiplying or dividing by the same value, and asked for clarification.
 - *Response: The confusing wording was a result of a formatting issue in the draft, what looked like a division sign was actually strikethrough formatting, and that the intent is to use multiplication in the formula moving forward.*

Samantha thanked the RAC members for the discussion.

Provide Input on the Economic Impact Statement

Samantha introduced the next agenda item, inviting Danielle Boudreaux, DSL, to present the fiscal and economic impact statement associated with the proposed rule changes. The group walked through the statement with Samantha pausing periodically to ask if there were any questions or comments. With no further input, Danielle concluded the review of the fiscal impact statement.

Provide Input on the Racial Equity Statement

Danielle reviewed the Racial Equity Statement. She reminded the group that the requirement stems from a 2021 Oregon House Bill mandating that state agencies include a statement assessing how proposed rule changes will affect racial equity. The goal of the discussion was to determine whether DSL's rule changes would have any identifiable impact on specific racial groups in Oregon. Danielle noted that the rules apply broadly to a wide range of stakeholders, including government agencies, developers, and conservation groups. She then asked if any particular racial groups might be more likely to be affected by the rule changes.

- A RAC member commented that it seemed the rule changes would apply uniformly to those proposing development or requiring mitigation. They did not see a clear reason to believe that one racial group would be more impacted than another.
 - *Response: DSL rules are designed to apply equitably to all applicants, with no distinctions based on race.*

Danielle proposed stating in the official racial equity statement that there is no discernible impact positively or negatively on racial equity as a result of the proposed rule changes. RAC members were invited to indicate their agreement with a thumbs-up. All participants responded with thumbs-up reactions, confirming agreement with this statement.

Review the Need for the Rules

Danielle shared a document which focused on the major points behind the rulemaking. Danielle invited the RAC to share if they felt anything had been missed. She reiterated that the main focus has been on stream mitigation, accounting, and mitigation banking. Danielle asked the group to reflect on whether this summary captured the key reasons behind the rulemaking. She also provided updates that had been discussed earlier in the meeting, including efforts to improve estuary and wetland mapping along the coast, reduce barriers to voluntary habitat restoration under current permitting rules, and adjust how the agency accounts for wetland acreage loss when compensatory methods fall short of fully replacing impacted areas. No comments or questions were shared by RAC members.

Interested Party Comments

Samantha noted that at this point in the meeting, no Interested Parties were participating.

Next Steps

Danielle shared that the Meeting #6 Summary will be sent to RAC members in the coming weeks and that all meeting materials, including the most recent meeting's recording, will be posted to the rulemaking website: <https://www.oregon.gov/dsl/pages/rulemaking.aspx>. Next, DSL will complete a final review of the draft rules and related materials before opening a public comment period from October 1st to October 31st.

Danielle noted that DSL plans to hold at least one virtual public rule hearing in the future. RAC members will receive notice when the public comment period opens, including instructions for submitting written comments and joining hearings. All rulemaking materials will be posted on DSL's website, with updates within a week of the meeting and full materials available on October first.

Danielle clarified that these rules require Director approval rather than State Land Board approval, streamlining the final process. DSL expects to file the rules by the end of December, with the effective date one or two months later to allow time for public notification and website updates.

Danielle closed by thanking the group for their time and valuable feedback.

Appreciation and Adjourn

Samantha expressed sincere gratitude to all RAC members for their participation and dedication over the past six meetings. She acknowledged the wealth of valuable information and insightful comments shared during discussions and thanked the DSL staff for their preparedness, organization, and responsiveness to RAC member feedback.

Grey highlighted the consistent commitment of RAC members over five months, praising their indispensable feedback that helped identify blind spots and anticipate potential impacts of the rule changes. Grey emphasized the significance of the members' contributions and extended deep appreciation for their expertise and effort.

Melody shared her gratitude for the RAC's engagement and feedback, noting that this group was among the most responsive and connected teams observed. She also mentioned that the members' questions have improved her own training skills, as she will be responsible for training staff and the public on the new rules. Melody expressed hope to collaborate again soon.

Additional RAC members shared their appreciation for the well-organized and communicative process. One member described this as the best RAC experience he has had with DSL, praising the proactive and open approach. Another member echoed this sentiment, emphasizing the effective outreach and facilitation. An additional appreciated the smooth process and meaningful interactions. Another member commended the clear presentation of the complex 60-page rule changes, appreciating how well the rationale and details were communicated. A final member praised the office hour format for allowing deeper conversation and digestion of materials.

Samantha closed by thanking everyone once again for their time and dedication, and officially adjourned the final meeting.