

June 4, 2019

Dear Phase 2 Rocky Shores working group:

These comments is from a citizen who has lived in Oregon since 1977 and on the coast since 1987 and is informed by knowledge gained from both my work and personal experiences.

I don't have to tell you that Goal 19 requires the state to assure that all actions by local, state, and federal agencies that are likely to affect the ocean resources and uses of Oregon's territorial sea shall be developed and conducted to conserve marine resources and ecological functions for the purpose of providing long-term ecological, economic, and social values and benefits

To carry out this goal, among other things, Goal 19 requires that: Management measures for ocean resources and uses shall be appropriate to the circumstances and provide flexibility for future actions.

This language is carried forward and echoed in the Rocky Shores Strategy (Strategy) whose goal is: To protect the ecological values and coastal biodiversity within and among Oregon's rocky shores while allowing appropriate use. The Strategy also has language as does Goal 19 of acting in a precautionary manner when there are gaps in information.

In thinking about your goals at the meeting it seems to me that this whole process of community/agency site designations is a very cumbersome one that would presumably and necessarily depend on resource assessments that the state makes available. However, the state, for lack of resources, has done very few resource assessments. Without such resource assessments, how can the state assure that it is providing for the long-term benefits for current and future generations? Shouldn't the default be a conservation designation everywhere? Shouldn't the nomination process be flipped on its head? Have communities ask for the relaxation of such status based on site specific community/agency information that resources are being managed so as to indeed provide that long-term and sustainable appropriate use?

What about the harvesting of organisms under current rules? Do we know, for example what the historic or current population size of invertebrates, the size of individual members of the population and how it has changed over time? Do we know how sea star wasting disease and ocean acidification and hypoxia and warming waters will affect these populations? Are the current regulations still appropriate? Where might that be? Shouldn't the default be conservation until such information is known? The rules currently are (as put forward in the existing Rocky Shores Strategy):

"no limit on the number of sand crabs, kelp worms, mud and ghost shrimp or Turban snails that may be taken. The daily catch limit is ten intertidal animals in the aggregate of all other intertidal animals (starfish, urchins, snails, and similar animals)."

This doesn't seem appropriate any more. Conservation designations should be applied to rocky shores unless enough information is know to allow appropriate, sustainable harvest.

Where information is lacking Goal 19 and the Rocky Shores strategy both seem to require such an approach.

Thank you for your attention.

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