

Public Comment Summary

Territorial Sea Plan: Part 3 Update – Phase 1

Public Comment Period – February 23, 2019 through March 25, 2019

Total Number of Comments Received – 693

Public Comment Events

Sat. 2/23/2019 1:00-2:00pm	Cape Perpetua Visitor Center - 2400 US-101, Yachats
Tuesday 3/5/2019 3:00-4:00pm	Remote Webinar
Monday 3/11/2019 3:00-4:00pm	Remote Webinar
Tuesday 3/12/2019 4:00-6:00pm	Tolovana Inn - 3400 S Hemlock St, Cannon Beach
Friday 3/15/2019 4:00-6:00pm	Inn at Face Rock - 3225 Beach Loop Dr SW, Bandon

Comments were accepted at in person meetings, in remote webinars, and via email to

TSP.Comments@state.or.us

Comment Topic Summary

This is an outline of comments submitted in the public comment received February 23-March 25, 2019. The full packet of public comments is available on the following pages. Comments with the same text or a subset of the same text from multiple users are represented by a single copy of the message and the number of messages with that text received.

General Comments

- Consider how to protect rocky habitat areas from the impacts of climate change, ocean acidification, and stronger storm surge (particularly with respect to submerged aquatic vegetation).
- Education, outreach and engagement principles should be less vague and include reference a more solidified process for achieving principles (whether it be financial assistance or networking).

Direct Language Changes

- Terminology clarification regarding definitions
 - Consider alternate terminology to distinguish rocky habitat types
 - Clarify that “rocky shores” includes all rocky habitat between the upland vegetation line and the submerged extent of the territorial sea by placing definitions near the beginning of the document.
- Remove limiting language in community proposal process, allowing OPAC to consider merits of proposals without pre-determined limitations-
 - Change in language to allow subtidal areas to be eligible for designation through community proposal (allow proposals for sites below extreme low water – pg. 3)
 - Change language to remove limitation on proposing entity eligibility (currently written as “local community groups and the public at large” as well as “All Oregon community members” – pg. 3)
 - Change in language to remove limitations on the number of community proposals OPAC may review per year (currently set at 5 per year in the Appendix I.2 but is expected to be revised by the working group in Phase 2 work)
 - If limitations are not removed, include additional justification & clarity for the limitations.
- Additional language outlining a process for managing agencies to put forward recommended changes to site designations beyond the public proposal process.
 - Agency proposals should also be based on best available science, and where data are lacking, should use a precautionary approach to monitoring and managing.

**This message (in full or partially) was received from
677 individuals.**

Subject: Please protect all of Oregon's rocky habitats

Chair Carter and Council Members:

I am writing to support the Ocean Policy Advisory Council's (OPAC) efforts to update the management of rocky habitats in Oregon, amend the Rocky Shores Management Strategy (Strategy), and review site-specific designations. Oregonians are already witnessing the impacts of climate change firsthand, including stronger storm surges and acidifying waters. OPAC should consider how protection of rocky habitats through this process can help guard against these effects, particularly with respect to submerged aquatic vegetation.

The current draft Strategy places several limitations on rocky habitat designations, including limiting the scope of designations to the shoreline out to extreme low water, limiting who may submit a proposal, and limiting the number of proposals that may be considered each year. I strongly request that you not limit the scope of this effort before public proposals are submitted. The appropriate time to decide on whether a proposal warrants consideration is during OPAC's evaluation, not before the process has started.

Oregon's rocky shores, offshore islands, and submerged reefs are home to biologically rich communities and are important to coastal economies, accounting for millions of visits to the Oregon coast each year. I believe all of these areas deserve protection and should be considered in the site designation process and that OPAC should accept proposals from all members of the public. Please ensure an open and inclusive process by allowing anyone to propose a site designation of any rocky habitat area, even below extreme low water.

I also ask that you not limit the number of proposals that are considered each year. Given the Strategy has not been updated since 1994 and we have gained significant scientific understanding of these habitats since that time, limiting the number of designations that can be reviewed, at least initially, would undermine the effort to conduct a full update of site designations.

Finally, the Strategy should outline a process for managing agencies to put forward recommended changes to site designations beyond the public proposal process. It is not clear that there is currently a method for them to do so. Agency proposals should be based on the best available science and, where data are lacking, should use a precautionary approach to monitoring and managing these areas.

Thank you for prioritizing conservation of Oregon's rocky marine habitats to ensure their long-term ecological, economic, and social value for future generations.

Sincerely,



Oregon

Kate Brown, Governor

Department of Fish and Wildlife

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March 21, 2019

OPAC
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Chair Carter and OPAC members:

Thank you for the opportunity to provide comments on the draft Rocky Shores Management Strategy. The revision is a welcome process and product, one that the Rocky Shores Working Group and OPAC should be proud of. This long overdue revision brings up to date the description of Oregon's rocky habitats, scientific information, and new challenges for sustainability. The comments in this letter are directed at improving the clarity of the scope and definitions in the Strategy.

The strategy addresses both rocky intertidal habitat along the ocean shoreline and rocky subtidal habitat throughout the Territorial Sea. Yet, the organization of the document and terminology used do not clearly reflect how plan elements apply to these distinct habitat types. For example, the title "Rocky Shores Strategy" implies the document addresses only the shoreline. The reader needs to progress well into the document before it becomes apparent that "Rocky Shores" includes both the shoreline and all rocky subtidal habitat in the Territorial Sea. The precise definitions for types of habitats covered by the strategy is not presented until page 9, while the majority of the strategy's actionable policies appear before page 9. Placing the rocky shore definitions near the beginning of the document would be helpful; however, the terminology is still confusing and not always consistently applied. For example, some statements in the strategy apply to all rocky shores types while some only apply to rocky shoreline, and these distinctions are sometimes ambiguous in the document. In addition, the terms "rocky shores" and "rocky shoreline" are too similar to make it easy for the reader to know that these denote very different areas.

I recommend the following to clarify the document:

- 1) Make it clear that the strategy applies to both intertidal (i.e., shoreline) and subtidal rocky habitat, and covers the entire Territorial Sea. Provide clear statements about why the strategy includes subtidal rocky habitat.
- 2) Place the rocky shores definition near the beginning of the document
- 3) Consider using alternate terminology that better distinguishes rocky shores types
- 4) Throughout the document, be sure it is clear which types of habitats are being addressed by particular, policies, guidelines, and other statements. This can be achieved through consistent use of terminology and by organizing statements or sections to better separate rocky intertidal vs. subtidal habitat.

I hope these comments are helpful. Feel free to contact me if you have any questions.

Sincerely,

Caren Braby
Marine Resource Program Manager
Oregon Department of Fish and Wildlife

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Ocean Policy Advisory Council
c/o Andy Lanier
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March 25, 2019

Comments re: the Draft Rocky Shores Management Strategy

Dear Chair Carter and members of the Ocean Policy Advisory Council:

The Oregon Shores Conservation Coalition commends OPAC's rocky shores working group for the progress it has made toward an updated and more comprehensive set of policies for managing and protecting Oregon's rocky intertidal and subtidal resources. Oregon made a good start toward a rocky shores management element of the state's Territorial Sea Plan (under Goal 19 of Oregon's statewide land use goals) in the early '90s. However, that earlier plan was never fully implemented, and it had not been revisited in a quarter-century. The current effort to develop a new Rocky Shores Management Strategy is much needed. The overarching objectives in the draft strategy are excellent, and Oregon Shores strongly supports the emphasis on cooperative management and ecosystem-based management.

We do have some concerns about provisions or what we consider omissions in the draft strategy. In addition to the comments below, we also incorporate our earlier recommendations, submitted April 9, 2018, by reference.

- We would argue that a regular timeline for periodic review and update of the strategy should be incorporated within the management strategy. The open-ended process for community-based proposals (see the next item) may help to keep the strategy updated, but does not substitute for a full-blown review of the entire strategy by all the entities cooperating in its fulfillment. In our earlier recommendations, we suggested 15-year intervals.

- We are concerned about the language in 4 a i, which states that “coastal stakeholders” are invited to submit proposed modifications at any time. This phrase is either meaningless or dangerously exclusive. Oregon’s shoreline and territorial sea resources belong (we might prefer to say “are in the keeping of”) all Oregonians, equally, meaning that all Oregonians are stakeholders in their conservation. All Oregonians should feel equally welcome to participate in the management of our rocky shore areas.
- The draft suggests somewhat vaguely that the opportunity for both agencies and “stakeholders” to propose changes is limited to designations of particular areas. The language used is that proposals “may include” designation, so it isn’t strictly exclusive. Still, we believe it should be clear that changes to the strategy of any type can be suggested at any time. We oppose limiting the number of such proposals to be considered in any given year (whether to five, as currently stated in Appendix 1, or any other number). It is unclear to us from the language of the draft whether management agencies are limited in their ability to propose changes; if that is the intent, we oppose it, and instead urge that management/resource agencies, like members of the public, be free to suggest revisions at any time.
- It is fine to encourage proposals with broad bases of support (“multi-stakeholder interests” in the language of the draft). Certainly, at some point in the course of considering proposed changes, it will be important to solicit input from diverse groups within affected communities. That said, the proposed initial approach (based on the “prompting questions”) is too daunting. Individuals or small groups with a good idea to suggest should not be confronted with the expectation that they engage in what could be a massive amount of community organizing before they ever come forward. We are agreed that management of our rocky shores should be science-based, and good science doesn’t depend on a social consensus. A lone biologist or naturalist (for instance) with a sound argument for why the resources of a given area would benefit from a higher level of protection shouldn’t be burdened with consulting with local chambers of commerce, fishing industries, tourism interests, etc., before submitting his or her idea. Rather, OPAC and the Coastal Management Program should set up a process for vetting initial proposals, and then, with proposals deemed plausible, assist proposers in bringing their proposals to affected geographic communities and communities of interest.
- Whether or not there is “a complex network of regulations and users,” subtidal areas should be subject to management changes proposed by members of the public along with rocky intertidal areas. There is continuity from lowest low water habitats to adjacent subtidal ones; ecology-based management would seem to require that proposals be allowed to relate to such linked habitats. We can see that there is a stronger argument for excluding subaerial reefs and islands, since these currently fall under the jurisdiction of

the federal government. However, recent political developments demonstrate that federal protection of public lands isn't necessarily permanent. Oregonians should be able to address the ways in which conservation concerns for these habitats are expressed in the state's Territorial Sea Plan, regardless of future federal actions.

- We object to footnote 3 at the bottom of page 4 of the draft. We certainly understand that adding new offshore marine reserves is not to be addressed as part of this process. However, we do not believe that modest alterations to better mesh marine reserves with this rocky shores management strategy should be categorically excluded. In our earlier recommendations, included here by reference, we advocated for a new designation of Intertidal Marine Reserve. Actual designations are not being considered in this phase of development of the rocky shores strategy, but we urge that the potential for creation of this designation be preserved. The goal is not to broadly expand marine reserves, but to bring coherence to management of the reserves by linking them to this level of protection of adjacent intertidal resources. This would, in effect, expand the reserves slightly, to beneficial effect in overall management of the reserves and of territorial sea resources; we strongly request that this possibility not be dismissed until the phase in which a full review of designations is undertaken.
- We enthusiastically support the emphasis on well-coordinated public communications about rocky shores, and on citizen science, in the Education and Public Awareness section of the draft. That said, this section needs a great deal of work. It includes statements that are too vague to be helpful: “Current education program providers **should** collaborate on a systematic approach to targeting audiences with agreed upon messages” (emphasis added). If this injunction is to be part of the adopted strategy, the very hard question of how resource agencies, educational institutions, aquariums, coastwide organizations like Oregon Shores, and local groups (e.g. Shoreline Education for Awareness in Bandon, “Friends of” groups for the marine reserves, etc.) are to coordinate must be addressed in the strategy, not just assumed. Stating that “This will require both financial and institutional support and coordination to achieve maximum effectiveness” is feel-good rhetoric without a strategy that identifies sources of such support. Airily stating that “**new** and already established locally-based and regionally supported programs are needed....” (emphasis added) is deeply questionable. There are already a great many organizations and programs operating on the coast, coordinating their efforts (as noted above) is a daunting challenge as it is, and the notion of fostering still more entities is a concept that should be the subject of very serious discussion, not blithely tossed off in the strategy document with no further justification.


- Following from the above, we suggest that #3 under Education Actions be rewritten to state “Support the extension of education and interpretation programs conducted by existing organizations to cover sites that are not currently covered.”
- We appreciate including citizen science in #8 under Education Actions, but consider the language of this item to be highly problematic. Here again, the word “stakeholder” creeps in. If this is meant to mean anyone who cares about the coast, then some other phrase should be found, because “stakeholder” in some minds connotes people with a vested economic interest in an area or resource. Non-profit organizations, which are not “stakeholders” in that narrower sense, are already heavily engaged in monitoring and citizen science. We aren’t sure what “developing a citizen science program that engages local communities and visitors” is intended to mean as part of this strategy. Is this suggesting that some entirely new program be developed, and if so, by whom? How would this relate to all the existing citizen science projects currently being conducted by Oregon Shores’ CoastWatch program, Audubon, Surfrider, COASST, land conservancies, local groups, and others? It is unclear whether some new, sweeping initiative is being proposed, in which case the strategy doesn’t remotely include enough detail, or whether this is again a vague statement wishfully hoping that all the many ongoing efforts be somehow coordinated.
- Following from the above, we suggest that the strategy be amended to abjure vague statements about education and citizen science, acknowledge that a wide range of activities are already underway that could use better coordination, acknowledge that sources of support (especially financial) for such coordination are unknown at present, and instead set forth as an objective a process (e.g., an education and citizen science “summit”) through which all existing entities engaged in education and citizen science can work together to develop a legitimate, fully worked-out strategy that can later be incorporated in this rocky shores management strategy.
- We differ from some of our colleagues in urging that the term “citizen science” be retained. We do so for two reasons. First, “citizen science,” under that banner, has become a growing and critically needed movement. If we are to track widespread changes in our increasingly stressed environment, we will need monitoring resources that vastly outstrip those of resource agencies and academia. As the draft correctly indicates, citizen science has a key role to play in managing Oregon’s rocky shores, as it does worldwide in addressing our changing environment. Switching the familiar term for symbolic reasons could confuse the issue and set this movement back. Equally important, we consider there to be a significant difference between “citizen science” and “community science”—the latter, often proposed as an alternative term, is instead needed to designate a particular type of citizen science. “Community science” is needed as a

term to indicate citizen science that actually is practiced at the community level—examples would be the Christmas Bird Count, or the “Community Science Teams” that Oregon Shores/CoastWatch is organizing at marine reserves, to pull together a variety of citizen science projects into a larger whole and communicate results back to neighboring communities.

- As a general point with regard to the strategy, we join with conservation colleagues in urging a stronger precautionary principle underlying the management strategy. The overriding goal must be to preserve our rocky shore habitats and resources. Where the effects of actions in the rocky shore environment aren’t certain, or sufficient information isn’t available, all agencies managing rocky shores should default to protection, as with the physician’s “First, do no harm.”
- While the draft strategy refers to climate change, no affirmative actions are set forth. We would propose two, at least: 1) Preserve and, where possible, restore kelp forests and other offshore vegetation, which serve as buffers and carbon sinks, not to mention providing critical habitat; and 2) begin a process of identifying onshore buffer areas that could be acquired to allow for future up-migration of rocky shoreline habitats.
- We understand that specific site designations will be considered during the next phase of this process. We do want assurance that before site-by-site designations are considered, proposed new types of designations will be fully discussed. As noted elsewhere in these comments, we include our earlier recommendations by reference. Those recommendations propose new types of designations (e.g., Intertidal Marine Reserve). If there will be an opportunity to fully explore this issue in the next phase, well and good, but if it is necessary that the types of designations be established in concept in the objectives and policies addressed by the current draft, we object to the failure to give due consideration to the structure of categories under which site designations will be made.

Thank you for the opportunity to make these comments. We look forward to continuing to work toward the development of this much-needed, comprehensive strategy for Oregon’s vital rocky intertidal, subtidal, reef, and island habitats.

Sincerely,

A handwritten signature in dark ink, appearing to read "Phillip Johnson", followed by a long horizontal flourish.

Phillip Johnson, Executive Director
Oregon Shores Conservation Coalition
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March 22, 2019

Re: Comments on the Draft Rocky Shores Management Strategy

Dear Chair Carter and members of the Council:

We write to support the Ocean Policy Advisory Council's (OPAC) efforts to update the management of rocky habitats within Oregon's territorial sea and amend the Rocky Shores Management Strategy (Strategy). Oregon has long recognized the ecological, economic and social value of rocky habitats. These areas belong to the public and should be managed to ensure they continue to provide benefits for future generations.

Specifically, we make the following recommendations:

1. Adopt goals, objectives and policies that require agencies to avoid impacts to rocky habitats and apply a precautionary approach;
2. Consider how rocky habitat protections can help lessen the impacts of climate change;
3. Establish a process through which managing agencies can bring forward recommended changes to site-specific designations;
4. Create an open and inclusive designation process by:
 - a. allowing anyone to bring forward a site designation proposal,
 - b. including all rocky areas in the designation process including offshore rocks, submerged reefs and rocky subtidal habitat, and
 - c. not limiting the number of proposals that may be considered annually; and
5. Rename the Strategy to better reflect the habitat types that it covers.

We appreciate the opportunity to comment on the draft Strategy and commend the Working Group on their efforts. We provide further detail and context for our recommendations below.

1. Adopt goals, objectives and policies that require agencies to avoid impacts to rocky habitat using a precautionary approach

We are encouraged by the inclusion of goals, objectives and policies that prioritize the long-term protection of rocky habitats for the benefit of future generations consistent with Statewide Planning Goal 19.¹ However, we encourage OPAC to strengthen these policies by requiring managing agencies avoid potential impacts on rocky habitats and not merely consider impacts to these areas resulting from actions they permit or regulate.

Specifically, we request that this language be added to Policy G and K.² Under the draft strategy, Policy K requires that “[m]anagement actions shall consider adaptation and resilience to climate change, ocean acidification, and hypoxia effects on the rocky shores.”³ We recommend OPAC expand the policy to require managing agencies not only consider climate change but also take action to avoid, minimize and mitigate the impacts of climate change. Similarly, Policy G should require agencies to avoid long-term impacts to rocky habitats that may result from the administration of regulations, permits and other agreements under their authority.

Further, we recommend the addition of a Management Principle (Section A.5.a.) and a Policy (Section A.6.b.) that require state agencies to implement a precautionary approach to the management of rocky shores and the regulation of their use. In areas where data is lacking, the Strategy should require managing agencies to prioritize conservation.

2. Consider how rocky habitat protections can help lessen the impacts of climate change

We recommend that OPAC take a comprehensive approach in thinking about how protection of rocky substrate can benefit kelp and other submerged aquatic vegetation (SAV). This includes prioritizing preservation of existing kelp and seagrass habitat and identifying sites where conditions are favorable for restoration. Oregonians are witnessing the effects of climate change firsthand including fishery closures, stronger storm surges and acidifying waters. The Strategy should include consideration of how rocky habitat protections can help guard against these impacts.

¹ Oregon’s Statewide Planning Goals & Guidelines, Goal 19: Ocean Resources, OAR 660-015-0010(4) (“To carry out this goal, 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 and to give higher priority to the protection of renewable marine resources—i.e., living marine organisms—than to the development of non-renewable ocean resources.”).

² Draft Rocky Shores Management Strategy, Last Edited 2/21/2019, p. 7-8.

³ *Id.* at 8.

In 2017, the passage of Oregon Senate Bill 1039 declared that “ocean acidification and hypoxia severely endanger the state’s commercially and culturally significant ocean resources”⁴ and created the Oregon Coordinating Council on Ocean Acidification and Hypoxia (OAH Council) to provide recommendations and guidance for the state of Oregon on how to respond to these issues. The OAH Council’s first biennial report released last September identifies recommended actions including working with OPAC in the revision process for this Strategy to “ensure that OAH adaptation and resilience strategies are incorporated into long-term planning outcomes for Oregon’s Rocky Shores management.”⁵

Mature kelp forests have the potential to absorb carbon and buffer against ocean acidification.⁶ They also mitigate against coastal erosion and flooding by dampening the effects of waves before they reach our shorelines and provide important habitat for many commercially and recreationally important species. Consideration of how protecting rocky substrate can benefit SAV is consistent with the OAH Council’s recommendation to “support new OAH resilience initiatives to sustain Oregon’s habitats, species and human communities”⁷ and should be incorporated into the Strategy.

3. Establish a process through which managing agencies can bring forward recommended changes to site specific designations

It is unclear from the current draft Strategy that managing agencies can propose changes to site designations. We recommend this be clarified to allow agencies to put forward recommended changes based on the best available science and, where data is lacking, use a precautionary approach to conserving rocky marine habitats. The agencies responsible for managing our rocky shores hold these areas in trust for the public and must ensure they continue to provide long-term ecological, economic and social value and benefits to future generations as required by Goal 19.⁸ The draft Strategy places the burden on the public to propose changes to site designations and to justify those designations with an extensive proposal application. While we strongly support the public proposal process, our state agencies have a responsibility to ensure management in these areas is adequate and are highly qualified to endorse changes at specific sites based on the data presented.

⁴ Senate Bill 1039, Section 1, 79th Oregon Legislative Assembly, 2017 Regular Session.

⁵ Barth, J.A., C.E. Braby, F. Barcellos, K. Tarnow, A. Lanier, J. Sumrich, S. Walker, F. Recht, A. Pazar, L. Xin, A. Galloway, J. Schaefer, K. Sheeran, C.M. Regula-Whitefield. The Oregon Coordinating Council on Ocean Acidification and Hypoxia. First Biennial Report. September 2018, p. 32.

⁶ Nielsen, K., Stachowicz, J., Carter, H., Boyer, K., Bracken, M., Chan, F., Chavez, F., Hovel, K., Kent, M., Nickols, K., Ruesink, J., Tyburczy, J., and Wheeler, S. *Emerging understanding of the potential role of seagrass and kelp as an ocean acidification management tool in California*. California Ocean Science Trust, Oakland, California, USA. January 2018.

⁷ Barth, J.A. et al., p.32 (citing Senate Bill 1039, Sec. 3(1)(b)).

⁸ Oregon’s Statewide Planning Goals & Guidelines, Goal 19: Ocean Resources, OAR 660-015-0010(4).

4. Create an open and inclusive site designation process

We appreciate the opportunity for members of the public to nominate sites for designation. However, we note that the draft Strategy preemptively confines the designation process by limiting the scope of designations to the rocky shoreline area, limiting who may submit a proposal, and limiting the number of proposals that may be considered each year. We recommend the following changes to the Strategy and Appendices to ensure a more open and inclusive process.

a. Allow anyone to bring forward a site designation proposal

The Strategy should provide the opportunity for anyone to bring forward a proposal and define a process to review the justification for such proposals. The draft Strategy limits who may bring forward a proposal to “Oregon community members.”⁹ Although the draft Appendix A provides a glossary of terms, it does not define “Oregon community member” and it is not clear what the threshold for this standard would be. Oregon’s marine resources belong to the public at large, held in trust by the state of Oregon, and all members of the public should be eligible to make recommendations on their management.

Restricting who may bring forward a proposal undermines the public process. If the Strategy ultimately limits who may bring forward proposals, it must clearly define how that standard will be applied and should provide justification for why proposals that do not meet this criterion are not worthy of consideration.

b. Include all rocky areas in the designation process including offshore rocks, submerged reefs and subtidal habitat

The draft Strategy limits the scope of designations to the area from the shoreline out to extreme low water (ELW). There is no scientific justification for limiting designations to above ELW and it is not consistent with the Strategy’s Management Principles which dictate that rocky habitats be managed as an ecological unit¹⁰ using ecosystem-based management¹¹ and that planning be based on the best available science.¹²

⁹ Draft Rocky Shores Management Strategy, p. 3.

¹⁰ Draft Rocky Shores Management Strategy, Management Principles, p. 4 (“Ecological Units. The interconnected relationship between rocky shoreline areas, offshore sites, and associated rocky features warrants related areas to be managed as an ecological unit”).

¹¹ *Id.* (“Ecosystem Based Management. Management recommendations and prescriptions should follow ecosystem based management and adaptive management principles”).

¹² Draft Rocky Shores Management Strategy, p. 5 (“Planning or recommended management actions by [OPAC] or any agency with respect to rocky shoreline areas should be based on the best available scientific information”).

By excluding areas beyond ELW, the Strategy would limit potential protections for offshore rocks and islands and submerged rocky habitats, which provide important ecosystem services. Rocky substrate is essential for kelp, which, as discussed above, can help mitigate the impacts of climate change.¹³ Conserving and restoring SAV is one of the priority actions recommended by the OAH Council.¹⁴ Oregon's offshore rocks and islands provide important habitat for seabirds and marine mammals. Although most of these areas are included in the federally managed Oregon Islands National Wildlife Refuge,¹⁵ that does not preclude the state from incorporating these areas into the Strategy and expanding their protections below the mean high-water line. The Strategy should include all rocky areas in the designation process so that OPAC may consider additional protections for these special places.

c. Do not limit the number of proposals that may be considered annually

We recommend that proposals not be limited, at least in this first round of updates to site designations. The current draft of Appendix I limits OPAC's review of designations to five proposals annually.¹⁶ However, new designations or changes to existing designations may not require a lengthy review process. For instance, the current Strategy designates 39 sites, nine of which are "Not Yet Designated." It seems likely that these sites, already recognized in the Strategy, would be prime candidates for re-designation in the initial review of site-specific designations.

Since 1994, we have gained significant understanding of Oregon's rocky marine habitats and our impacts on them. Limiting the number of proposed designations that are eligible for review undermines OPAC's effort to fully evaluate and update the Strategy and bring it in line with the best available science. Therefore, we recommend that in the initial review of site-specific designations, the Strategy not limit the number of proposed changes and outline an annual process for review of additional proposals in the future.

5. Rename the Strategy to better reflect the habitat types that it covers

We recommend renaming the Strategy to more accurately describe its contents. "Rocky Shores" suggests the goals, policies and objectives laid out in the Strategy apply only to the rocky shoreline and not to the diverse and complex habitats covered by the Strategy including all rocky substrate, submerged reefs and offshore islands. This can lead to confusion among

¹³ Nielsen, K. et al., California Ocean Science Trust, January 2018.

¹⁴ Barth, J.A. et al., p. 33 ("Action 3.2.a Promote SAV conservation and restoration strategies and opportunities to achieve short-term buffering, carbon sequestration and ecosystem services benefits").

¹⁵ Oregon Islands, Three Arch Rocks, and Cape Meares National Wildlife Refuge Comprehensive Conservation Plan and Wilderness Stewardship Plan, U.S. Fish and Wildlife Service, Oregon Coast National Wildlife Refuge Complex, Newport, Oregon.

¹⁶ Draft Territorial Sea Plan Part 3 – Update Process, Appendices, p. 17.

members of the public and managers. We suggest that “Rocky Marine Resource Management Strategy” or “Rocky Habitat Management Strategy” might better reflect the intent for the Strategy to cover all rocky habitat and the marine life that depend on those habitats within Oregon’s territorial sea.

Conclusion

Oregon’s rocky marine habitats are a treasure, accounting for millions of visits to the coast each year. By making the above changes, OPAC can ensure this process results in better protections of our rocky habitats, which can increase our scientific understanding of these areas, benefit coastal communities, support wildlife, and reduce the impacts of climate change.

Thank you for considering these comments. We look forward to working with OPAC and other stakeholders to improve the management of our marine resources.

Sincerely,



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March 25, 2019

Oregon Dept. of Land Conservation & Development
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RE Rocky Shores Update, Phase 1

Dear DLCDD Staff & Rocky Shores Committee Members,

Thank you for your work to update the Rocky Shores Management Strategy. I have reviewed the Phase 1 draft and, as a coastal resident, submit these comments.

Management Strategy

-Plan Implementation: Community Based Proposals

"The Rocky Shores Management Strategy allows local community groups and the public at large to submit proposals for changes in rocky shore management...All Oregon community members are eligible to submit a proposal, with proposals representing local multistakeholder interests strongly encouraged." This is unclear. Why would you limit proposals to "local community groups" and who would that be? Why would you not to invite the expertise of science-based proposals from out of state organizations, especially if the proposals were required to show local stakeholder involvements? The proposals will be long and need lots of scientific expertise. Expecting non-scientists in coastal communities to do them may set the process up to have a less effective (and science-based) outcome. I ask that you allow any party to submit them.

"Due to the complex network of regulations and users, only rocky shoreline areas may be proposed for alteration, while shallow subtidal, and offshore rocky reefs and islands are not eligible for alteration under a community proposal." Both the nearshore and offshore area have multiple agencies involved in management. The offshore have as much merit for designation. I ask that you leave designations open to all of Oregon's rocky shore.

- Climate change: Thank you for including this important aspect of our ocean. Potential climate change effects to rocky shores include, but are not limited to, sea level rise, increase and intensity of storm events, ocean acidification and hypoxia events. Please review how these are discussed in the document. It is inconsistent and misses some of these, or at least just focuses on a few.

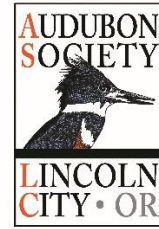
- Rocky Shore Uses: Cultural and Recreation: The top recreational use is wildlife watching, including bird watching and tidepooling (which also includes plants and algae). I suggest that you list all three by name up front in both sections.

Appendix I: Rocky Shore Community Proposal...

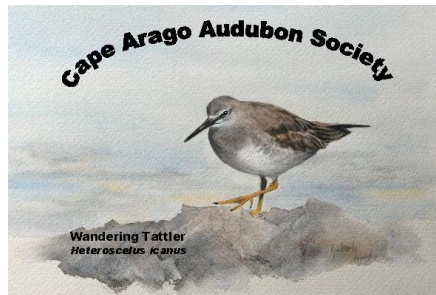
- Please do not limit to 5 per year. If they are not controversial, you may be putting a limit that is not needed.

Thank you for your consideration of my comments. Sincerely,

Nadia Gardner
Arch Cape, Oregon



Lane County Audubon Society



Corvallis, Oregon

Deanna Caracciolo

Rocky Shores Coordinator | Oregon Coastal Management Program
Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
TSPcomments@state.or.us

Re: Territorial Sea Plan (TSP) - Rocky Shores Amendment – phase 1

March 25, 2019

Dear Department of Land Conservation and Development,

On behalf of nine Oregon's Audubon Chapters and our more than 16,000 members across the state, we appreciate the opportunity to submit comments regarding the TSP Rocky Shores Amendment. We are encouraged to see Oregon Department of Land Conservation and

Development (DLCD) is moving ahead with this process and providing multiple opportunities for public comment.

Oregon's rocky shorelines are iconic and are important ecologically and recreationally. Many Audubon members across the state care deeply about these places and are concerned about their management and protection. These dynamic ocean shoreline habitats are home to a diversity of creatures living on the edge of their ecological threshold, including sensitive species of fish, birds, mammals, plants and invertebrates. The ODFW Nearshore Strategy lists a wealth of strategy species that reside or depend on rocky shores habitat¹. These habitats also offer important nursery grounds for economically important species (e.g. rockfish). At the same time threats from increasing human population and visitation², ocean acidification³, and other environmental and anthropogenic factors are placing new challenges on Oregon's rocky shore habitats and the species that occupy them. We look forward to a strong rocky shore management strategy that will prioritize protecting habitats in balance with human use.

Oregon Audubon Council Recommendations:

Included below we offer specific recommendations to the DLCD regarding the text in the first full draft of the general strategy:

Highest priority recommendations:

1. DLCD should provide more clarity and justification on why the community proposals to redesignate sites only will be allowed in the rocky shoreline zone (and not the subtidal/offshore rocky reefs). We strongly urge DLCD to consider adjacent subtidal areas as part of community-led proposal designations if there is ecological justification for it. Under the Management Principles section ii "Ecological Units" (Page 4) it states "the interconnected relationship between rocky shoreline areas, offshore sites, and associated rocky features *warrants areas to be managed as an ecological unit*". We agree with this management principle, yet the decision to only relegate community proposal site designations to rocky shoreline areas is incompatible with this management principle
2. We urge DLCD to include a Management Principle to defer to a *precautionary approach* for site management if current scientific information is inadequate (i.e. clear data gaps are present) inhibiting the ability to develop clear and effective management guidelines. The precautionary approach should support site designations with stronger protections until such a time where adequate science allows for a more cogent assessment of viable site management options. This precautionary approach language should also be included in section b. Policies (page 7).

¹ <http://oregonconservationstrategy.org/oregon-nearshore-strategy/>

² <http://www.oregonconservationstrategy.org/oregon-nearshore-strategy/coastal-communities/>

³ <https://www.oregonocean.info/index.php/ocean-acidification/85-oa-coord-council>

3. Although we are pleased that there is a mechanism for community members to submit site designation proposals it is unclear as to why relevant agencies (i.e. Oregon Department of Fish and Wildlife [ODFW], Oregon Parks and Recreation Department, etc.) are not formally invited to propose site designations. In particular, the mission of ODFW is "... to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations". Clearly, ODFW and other relevant agencies that have a mandate for protecting and effectively managing Oregon's wildlife and habitats should employ their in-house expertise and play a key role in the rocky shores process including proposing site designations at sites that are in need of protection based on best available science. A public comment period could easily be incorporated into any agency-led designation proposal.

Currently the community-led process for site designations, as it reads in Appendix I, places a lot of responsibility on the "nominating entity" (i.e. the community individual or group) to develop a proposal including "gather ecological and social site data, provide maps of the site, surveys and reports of stakeholder support and opposition, etc." (see figure on page. 18 in the Appendices document). Our coastal member groups have indicated this is a heavy lift in small rural communities where volunteers are already overtaxed with many needed community projects. The way this "community-led" process is currently framed we fear it will dissuade a lot of community members from submitting proposals due to the complex and time-consuming steps involved.

Moving forward in the rocky shores process ODFW (and perhaps an interagency group) should lead a review of the new DLCD rocky shore inventory and conduct a formal analysis to identify locations of conservation concern and propose site designations. This proposal then should be made available for public comment.

4. We urge DLCD to broaden the designation proposal process to all Oregonians. Oregon's rocky shoreline habitats are a resource for all Oregonians and even for ocean users that come from beyond our state's borders. Why should the proposal process be limited only to coastal communities?
5. We recommend that proposal nominations for new site designation (or re-designation) not have a limitation of five per year. There are many sites on the coast which had previously been labeled as "not yet designated" or "marine shore". Many of these sites may be worthy of designation based on the new inventory. At least in the first phase of site proposal review, there should be no limitation on site nominations and we also recommend allowing multiple sites be designated in one proposal.
6. We are concerned that sites that are designated (but not actively managed) are now no longer included in the chapter draft. In the original plan there were 8 marine gardens (current chapter draft includes 7), there were 7 Research Reserves in the original plan (current draft includes 6), the original chapter included 10 designated Habitat Refuges (only 1 included in the current draft) (See page 101 of original 1994 Rocky Shores Plan). At some time in the past those sites were designated and that information should not be

discarded. We do agree that those sites could perhaps be reevaluated and, if warranted for continued designation, should move to the next step of implementation to active management. For the time being those sites should remain in the chapter with their current designations or be sure to be included in subsequent parts of the rocky shore plan. It would be fine to list these in a table and indicate that they are not currently enforced by ODFW but had previously been designated.

7. We appreciate that DLCD will provide an interactive mapping tool that will facilitate the designation process. We ask that the agency provides all known relevant and up-to-date data layers for ecological, human use, climate change and other vital information that will be important for making designation decisions. The tool should be easy for members of the public to navigate.

Additional comments:

- We recommend providing more detail on the creation of a “coast-wide network and communications strategy” mentioned on page 6 and throughout the document. What agency, organization or group will take the lead on developing the communications strategy? What is the timeline?
- We recommend replacing the term “citizen science” with “community science” throughout the document. Many of us in the conservation field have made the important switch from "citizen science" to the more inclusive term "community science". Please read this: <http://debspark.audubon.org/news/why-were-changing-citizen-science-community-science>
- We recommend additional select literature citations be included in the plan to back-up key statements. In particular, it would be helpful to include citation(s) for the increasing human visitation on the coast since 1994 (see pages 2 and 14 of chapter). A citation regarding hypoxic and ocean acidification would also be helpful where these issues are mentioned on page 12.
- On page 18 Three Arch Rocks NWR is incorrectly lumped in with other sites as having a mainland portion. As far as we know, that NWR includes only islands. This needs to be corrected.
- The first sentence on page 10 of the Appendix document is incomplete.

We appreciate this opportunity to provide comments on the first full draft of the general strategy of the Rocky Shores update. We look forward to reviewing an improved draft as well as the first draft of Section D (rocky shore site inventory and site recommendations).

Sincerely,

Joe Liebezeit
Staff Scientist / Conservation Program Manager
Audubon Society of Portland

Paul Engelmeyer
Tenmile Sanctuary Manager
Audubon Society of Portland

Ann Vileisis, President
Kalmiopsis Audubon Society

Steve Griffiths, Conservation Chair
Audubon Society of Lincoln City

Diana Wales, President
Umpqua Valley Audubon Society

Debra Schlenoff, Conservation Chair
Lane County Audubon

Harvey Schuboth, President
Cape Arago Audubon Society

William Proebsting, President
Audubon Society of Corvallis

Ray Temple, President
Salem Audubon Society

Darrel Samuels, President
Klamath Basin Audubon

From: Lynn Herring [mailto:lynnhe@outlook.com]
Sent: Thursday, March 21, 2019 3:40 PM
To: Caracciolo, Deanna <dcaracciolo@dlcd.state.or.us>
Subject: Territorial Sea Plan - Rocky Shore Management Strategy Comments

Department of Land Conservation and Development
Salem, Oregon
deanna.caracciolo@state.or.us

Subject: Territorial Sea Plan - Rocky Shore Management Strategy Comments

Dear DLCD Staff:

First, thank you for providing the opportunity to comment on the Territorial Sea Plan and in particular the Rocky Shore Management Strategy.

Representing around 40% of the state's 362 coastline, Oregon's Rocky Shore is home to animal (invertebrates, fish, mammal, birds like the Black Oystercatcher) and plant life, living on the edge of ecological survival under constant, dynamic ocean conditions. In consideration of the intrinsic worth of these species and their place in the overall marine web of life, there is the ever present need for stewardship with sound management.

Threats include: Climate change impacts such as ocean warming, resulting influx of new species, displacement of species, and more severe storms; tsunamis, earthquakes; additional human impacts such as over-harvesting of species, overt habitat destruction, inadvertent oil spills, and underwater wave turbine action.

Community proposals to redesignate sites should include both the rocky shoreline zone as well as the adjacent sub-tidal/offshore rocky reefs with supported ecological justification.

Remember, everything is connected - life is a web.

Kudos for providing an interactive mapping tool to facilitate the process! Please include all possible data layers (many of which are listed under Threats above) to inform decision-making.

The Oregon Department of Fish and Wildlife (ODFW) should play a key role in the Rocky Shore process, especially in proposed designation of sites in need of protection, based on the best available science.

This is our watch. Let's do all we can to protect Oregon's rocky coast environment.

Sincerely,

Lynn Herring
1090 Chandler Road
Lake Oswego, OR 97034
lynnhe@outlook.com

From: [Dennis West](#)
To: [TSP comments](#)
Subject: Please protect all of Oregon's rocky habitats
Date: Thursday, March 21, 2019 10:17:41 AM

Chair Carter and Council Members:

I AM A NATIVE OREGONIAN AT 72 THAT SPENT SO MUCH TIME CAMPING WITH PARENTS AND BROTHERS I THOUGHT IT RAINED 24/7 UNTIL I WAS 13. THE COASTLINE OF THE ENTIRE COUNTRY IS ONE OF A KIND AND IT SHOULD ALL BE PROTECTED FROM MISUSE AND ABUSE FROM EVERY THREAT. PROTECTING ONE OF A KIND ROCKY SHORES AND THAT ANIMAL HABITAT IS AS IMPORTANT AS THE BEACHES.....AND CERTAINLY MORE VALUABLE THAN MONEY!!

"PROTECT ALL COASTLINES COMPLETELY!"

I am writing to support the Ocean Policy Advisory Council's (OPAC) efforts to update the management of rocky habitats in Oregon, amend the Rocky Shores Management Strategy (Strategy), and review site-specific designations. Oregonians are already witnessing the impacts of climate change firsthand, including stronger storm surges and acidifying waters. OPAC should consider how protection of rocky habitats through this process can help guard against these effects, particularly with respect to submerged aquatic vegetation.

The current draft Strategy places several limitations on rocky habitat designations, including limiting the scope of designations to the shoreline out to extreme low water, limiting who may submit a proposal, and limiting the number of proposals that may be considered each year. I strongly request that you not limit the scope of this effort before public proposals are submitted. The appropriate time to decide on whether a proposal warrants consideration is during OPAC's evaluation, not before the process has started.

Oregon's rocky shores, offshore islands, and submerged reefs are home to biologically rich communities and are important to coastal economies, accounting for millions of visits to the Oregon coast each year. I believe all of these areas deserve protection and should be considered in the site designation process and that OPAC should accept proposals from all members of the public. Please ensure an open and inclusive process by allowing anyone to propose a site designation of any rocky habitat area, even below extreme low water.

I also ask that you not limit the number of proposals that are considered each year. Given the Strategy has not been updated since 1994 and we have gained significant scientific understanding of these habitats since that time, limiting the number of designations that can be reviewed, at least initially, would undermine the effort to conduct a full update of site designations.

Finally, the Strategy should outline a process for managing agencies to put forward recommended changes to site designations beyond the public proposal process. It is not clear that there is currently a method for them to do so. Agency proposals should be based on the best available science and, where data are lacking, should use a precautionary approach to monitoring and managing these areas.

Thank you for prioritizing conservation of Oregon's rocky marine habitats to ensure their long-term ecological, economic, and social value for future generations.

Sincerely,
Dennis West
Yachats, Oregon 97498

From: [Darvel Lloyd](#)
To: [TSP comments](#)
Subject: Please protect all of Oregon's rocky habitats
Date: Monday, March 25, 2019 3:50:40 PM

Chair Carter and Council Members:

I feel strongly that you must strengthen the current draft of the Rocky Shores Management Strategy! Please include all portions of the Oregon in the public proposal process. Don't restrict who can nominate an area for protection. Don't limit the number of designations eligible for review each year.

Thank you.

I am writing to support the Ocean Policy Advisory Council's (OPAC) efforts to update the management of rocky habitats in Oregon, amend the Rocky Shores Management Strategy (Strategy), and review site-specific designations. Oregonians are already witnessing the impacts of climate change firsthand, including stronger storm surges and acidifying waters. OPAC should consider how protection of rocky habitats through this process can help guard against these effects, particularly with respect to submerged aquatic vegetation.

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I also ask that you not limit the number of proposals that are considered each year. Given the Strategy has not been updated since 1994 and we have gained significant scientific understanding of these habitats since that time, limiting the number of designations that can be reviewed, at least initially, would undermine the effort to conduct a full update of site designations.

Finally, the Strategy should outline a process for managing agencies to put forward recommended changes to site designations beyond the public proposal process. It is not clear that there is currently a method for them to do so. Agency proposals should be based on the best available science and, where data are lacking, should use a precautionary approach to monitoring and managing these areas.

Thank you for prioritizing conservation of Oregon's rocky marine habitats to ensure their long-term ecological, economic, and social value for future generations.

Sincerely,
Darvel Lloyd
Portland, Oregon 97215

From: [Susan Mates](#)
To: [TSP comments](#)
Subject: Rocky Shores Management Plan
Date: Monday, March 18, 2019 9:31:50 PM

To the Department of Land Conservation and Development:

Thank you for your hard work in updating the general strategy of the Rocky Shores Plan.

I first came to Oregon 40 years ago. As a young woman from the Midwest I was awestruck by the Oregon Coast. I have been saddened to see the degradation of those Rocky Shores over the years. Even protected Marine Gardens have comparatively few animals now. I have watched with horror as visitors trample and harvest protected wildlife even in places where staff and volunteers attempt to educate the public and safeguard the wildlife, such as at Haystack Rock.

These areas are undergoing an incredible amount of stressors that are racing out of our control: warming waters, ocean acidification and hypoxia, an increasing number of severe storms, increasing non-native and invasive species, and disease outbreak. We have rampant misuse of problems upstream that adversely impact these areas: land based runoff, pollution, clear-cutting and construction, the ubiquitous plastics, and marine debris. The increased population in our state and a surge in tourism at our coast has meant additional pressure on our Rocky Shores just when they are less and less able to withstand it.

I see in your policies that “protection of rocky shores (i.e. living marine organisms and their habitat) shall be prioritized over development of non-renewable ocean resource uses.” This is, however, your second bullet. Please make this the heart of all of your decisions. This is a treasure that we should not be wasting. I hope that you will strengthen this draft to provide increased rocky shore protections. Here is what I would like to see:

- DLCD should provide more clarity and justification on why the community proposals to redesignate sites only will be allowed in the rocky shoreline zone (and not the subtidal/offshore rocky reefs). Adjacent subtidal areas should be considered for designation if there is ecological justification for it.
- Submission of community-led proposals for rocky shoreline designations should be made as user-friendly as possible.
- The DLCD's interactive mapping tool will facilitate the designation process. I hope that it will provide all known relevant and up-to-date data layers for ecological, human use, climate change and other vital information that will be important for making designation decisions. The tool should be easy for members of the public to navigate.
- Oregon Department of Fish and Wildlife (ODFW) should show leadership and play a key role in the rocky shores process including proposing site designations at sites that are in need of protection based on best available science.

Thank you for providing an opportunity for public comment.

Susan Mates
8945 NW Oak Street
Portland, OR 97229

From: [Kimber Nelson](#)
To: [TSP comments](#)
Subject: Rocky Shores Management Plan
Date: Wednesday, March 20, 2019 7:00:35 PM

I appreciate the Department of Land Conservation and Development providing the opportunity for public comment on the Rocky Shores Management Strategy. I live in Portland but love visiting Oregon's coast, and the diversity of wildlife there is very important to me as a visitor, conservationist, and Oregonian. I have a few requests and suggestions related to this process:

Please provide more clarity and justification on why the community proposals to re-designate sites only will be allowed in the rocky shoreline zone (and not the subtidal/offshore rocky reefs). Adjacent subtidal areas should be considered for designation if there is ecological justification for it.

Please also make submission of community-led proposals for rocky shoreline designations as user-friendly as possible so this is truly a public process. The interactive mapping tool you are providing to facilitate the designation process is a great idea. I ask that the agency provide all known relevant and up-to-date data layers for ecological, human use, climate change and other vital information that will be important for making designation decisions.

Oregon Department of Fish and Wildlife (ODFW) should show leadership and play a key role in the rocky shores process including proposing site designations at sites that are in need of protection based on best available science.

Kimber Nelson
Portland, OR

From: [Barbara Quinn](#)
To: [TSP comments](#)
Subject: Rocky Shores Strategy Amendment
Date: Monday, March 25, 2019 3:20:58 PM

Decision makers,

The goals of the Rocky Shores Strategy need to be more explicit and elevated. We urge the Ocean Policy Advisory Council (OPAC) to incorporate the following goals:

- Please design the amendment for the utmost protection and conservation of the habitat, living marine resources and ecological functions of Oregon's Rocky Shores for future generations.
- Reflect and support the protections of adjacent Marine Reserves and Marine Protected Areas.
- Promote scientific research to inform better conservation, management, and protection of rocky shores habitat.

Thank you,
Barbara Quinn
7034 N Charleston
Portland OR 97203
503-954-3142

From: [Laurie Perry](#)
To: [TSP comments](#)
Subject: Please protect all of Oregon's rocky habitats
Date: Monday, March 25, 2019 5:56:47 PM

Chair Carter and Council Members:

Protect our coastline.

Sincerely,
Laurie Perry
Beaverton, Oregon 97005

From: [Jan Stone](#)
To: [TSP comments](#)
Subject: Please protect all of Oregon's rocky habitats
Date: Thursday, March 21, 2019 2:21:10 PM

Chair Carter and Council Members:

4732

Sincerely,
Jan Stone
Aloha, Oregon 97007

From: [Gary Gilardi](#)
To: [TSP comments](#)
Subject: Please protect all of Oregon's rocky habitats
Date: Thursday, March 21, 2019 10:58:44 AM

Chair Carter and Council Members:

Hood River

Sincerely,
Gary Gilardi
Hood River, Oregon 97031

From: [Dennis Sweeney](#)
To: [TSP comments](#)
Subject: Please protect all of Oregon's rocky habitats
Date: Thursday, March 21, 2019 11:19:26 AM

Chair Carter and Council Members:

1161

Sincerely,
Dennis Sweeney
Portland, Oregon 97213