



1 March 2020

Department of Land Conservation and Development:

The Surfrider Foundation appreciates the opportunity to provide comments on the Draft Rocky Habitat Management Strategy Phase II. The Surfrider Foundation is an environmental nonprofit organization dedicated to the protection and enjoyment of the world's oceans, waves and beaches for all people, through a powerful activist network. Our members live, work, visit, and recreate within Oregon's coastal beaches and rocky habitats and value these special places for exploration, research and enjoyment. As such, our membership and Oregonians at large are impacted by management decisions and designations for special coastal ecosystems such as rocky habitats and have an interest in the Territorial Sea Plan (TSP) Part III Rocky Habitat Strategy. In particular, designations for protected areas can have a variety of impacts to our membership and coastal users from improving the coastal experience by preserving ecosystems and wild spaces, to potentially restricting access and enjoyment.

Accounting for millions of visits to the Oregon coast annually, rocky habitats are a tremendous resource for recreation, exploration and hands-on, field-based learning. As ecotourism and experience-based vacations are on the rise, so are the number of visitors to rocky coastal areas and the potential for ecological impacts of recreation. Surfrider recognizes recreation in rocky habitat areas is critical to Oregonians' way of life and coastal economies; and, that those activities must be appropriately managed to balance the preservation and stewardship of these important resources. Surfrider further recognizes that it is the diversity of flora and fauna that drives this strong recreational interest, supporting the need for a balanced approach.

Further offshore, rocky reefs and habitats provide for premier diving and fisheries important to recreational and commercial ocean users. Oregon's recreational charter boat industry also depends on healthy fish populations on these reefs. In addition to providing a recreational resource, these fisheries, and the habitats they depend upon, are essential to the coastal economy.

Those of us who frequent our coast do so for different reasons, but we all value its importance and cherish our ability to enjoy it. The ability to surf, fish, dive, kayak and swim in a healthy wild ocean is our coastal legacy and our birthright. However, growing demands on these sensitive coastal and ocean places can threaten our marine ecosystems and the fabric of our coastal legacy. In fact, the coordinating strategy and many of the designations in Oregon's TSP for rocky habitats exist today because many of these demands were identified as early as the 1960s. This has led to an ethic associated with tidepools and rocky habitats that provides for both protection and enjoyment of these special places.

Oregon's coastal rocky habitats represent significant tradition, recreation, discovery, and scientific research, but it should not be overlooked that these areas may be significant for cultural and traditional uses long predating European settlement. Surfrider Foundation does not believe that the Rocky Habitat Strategy is an effective process for addressing many of these cultural considerations and that tribal consultations and engagement should be guided by the appropriate tribal government.

Rocky Habitat Phase II Comments

Surfrider recognizes that the demands on our rocky habitats and the science and research to support a coordinated management strategy for these areas has evolved heavily since the inception of the TSP strategy. Our members participated in and reviewed the extensive feedback and summary of the TSP Part III Public Scoping process to get a better understanding of these varied management considerations.

Surfrider has played a significant role in the TSP Part III working group to address many of these varied management considerations in both policy and public process. Our chapters and membership at large are extremely supportive of the policy work performed to update those coordinating strategies – in particular, protections of rocky habitat for existing uses over development that significantly alters habitat and the interest of the working group to address a statewide policy to protect submerged aquatic vegetation. Surfrider is further encouraged by the working group's coordination with the National Oceanic and Atmospheric Association to ensure that policies which reinforce Statewide Planning Goal 19 are "enforceable policies" and support the state's authority in managing our nearshore ocean.

Surfrider is additionally supportive of the development of a public process to propose new designations or alterations to existing designations. We believe the draft changes to the categories of designations (Marine Education/Garden Area, Marine Research Area and Marine Conservation Area) that support education, research and conservation goals reflect Oregonians' values of rocky habitats and will better support goal-oriented designations that may be proposed by the public.

At this time, Surfrider's Oregon Chapters do not have plans, capacity or expertise to submit designation proposals; however, they are interested in engaging in the public process to review proposals and will likely be approached by groups considering designation proposals for their potential support. Therefore, Surfrider has conducted outreach with our Chapters to develop the following statement to support their engagement in public proposals that may come forward under the TSP Part III: Rocky Habitat Management Strategy.

Statement on Rocky Habitat Public Proposal Process

Surfrider's engagement in the Rocky Habitat processes will aim to strike a balance between our organizational guiding principles¹ to both protect ecosystems and allow opportunities for enjoyment. Balancing Oregonians' opportunities for access, recreation, and exploration of our

¹ <https://www.surfrider.org/pages/environmental-policies>

wild and scenic coastal places while preserving the integrity of these special ecosystems and habitats is what makes Oregon special. Rocky Habitat designations or alterations to existing designations should have specific goals agreed upon by scientists, managers, affected users, and the public so that all stakeholders understand what resource(s) are being protected and the reasons for that protection. Designations should also consider long-term environmental stressors, such as those associated with climate change and be supported by the best available science.

In summary, proposals for new or altered rocky habitat designations should:

- have specific, measurable goals understood by the public,
- reflect strong stakeholder and community engagement,
- balance protection and access,
- have support and realistic capacity for implementation,
- enhance the coastal experience by preserving wild recreational areas,
- address new and arising uses, and
- consider long term environmental and climate change stressors such as ocean acidification, disease outbreaks, warming waters, etc.

Thank you for considering our comments.

Sincerely,



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This statement has been developed with the support of our Oregon Chapter network which includes our North Coast, Newport, Siuslaw, Coos Bay and Portland Chapter executive committees. Additionally, this statement pulls from the following broader national organizational and environmental principles approved by Surfrider National Board of Directors:

- *Position Statement on Marine Protected Areas²*
- *Policy on Marine Protection³*
- *Policy on Beach Access⁴*

² <https://www.surfrider.org/pages/surfrider-foundation-position-statement-on-marine-protected-areas-mpas>

³ <https://www.surfrider.org/pages/policy-on-marine-protection>

⁴ <https://www.surfrider.org/pages/policy-on-beach-access>