

**This correspondence file includes 14 documents sent to [southcoastrockyshores@gmail.com](mailto:southcoastrockyshores@gmail.com) and/or [jesse@oregonshores.com](mailto:jesse@oregonshores.com). CoastWatch volunteer coordinator, Jesse Jones, assisted with outreach for all groups putting in proposals as CoastWatch volunteers act as stewards in nearly all rocky habitats.**

Paul Sherman  
P.O. Box 1857  
Gold Beach, OR 97444  
16 December, 2020

To whom it may concern:

I am writing to support the proposal to protect shoreline and subtidal areas at Crook Point in Curry County under Oregon's Marine Conservation Area Program.

I am an emeritus Professor of Biology at Cornell University and a resident of Gold Beach. I am also a CoastWatch volunteer. The coastal mile that I monitor (Mile 21) stretches from the Pistol River Mouth south to the northern edge of the Crook Point National Wildlife Refuge. I hike this lovely stretch of beach and rocky shores every few weeks year-around, and so I know the area quite well.

Crook Point is a beautiful, undeveloped, unspoiled area. Onshore it is protected as a National Wildlife Refuge. Offshore, however, there is currently no special protection. The shoreline, and the nearshore tide pools, reefs, and islands are contiguous parts of the same ecosystem and should also be protected to preserve the biological integrity of the unit. Vertebrate and invertebrate marine life teams in the shallow coastal waters and the rocky intertidal habitats of Crook Point, and multiple species of marine birds breed on the islands (including black oystercatchers and peregrine falcons) and also stopover in the shallow coves during migrations. Many other people have realized the ecological and aesthetic values of the Crook Point shoreline and nearshore areas. In 1994 the unit was proposed for special management

protection as a Habitat Refuge. Unfortunately this proposal was not adopted. Now we have an opportunity to rectify this omission. Please preserve this magnificent area in perpetuity by designating Crook Point as a Marine Conservation Area.

Sincerely,

Paul W. Sherman

Paul W. Sherman  
[pwsherman@protonmail.com](mailto:pwsherman@protonmail.com)  
(541) 247-2799



**KALMIOPSIS AUDUBON SOCIETY**

Dec. 20, 2020

**P.O. Box 1265 • Port Orford OR • 97465**

To: Rocky Habitat Working Group

From: Kalmiopsis Audubon Society

Re: Support for increased protections for rocky intertidal sites on the South Coast

Greetings:

I am writing on behalf of the Kalmiopsis Audubon Society, based in Curry County, on Oregon's South Coast. Our group has about 400 local members who care about conserving habitat for birds, fish, and wildlife. Our members enjoy birdwatching and other outdoor nature study based on unique plants and animals in our local ecosystems, including our rocky shorelines. We support the State of Oregon's strategy of marine zoning to assure that areas with the highest natural values for marine life can be protected and conserved while other areas may incur greater use—rather than allowing for incremental degradation everywhere. We also strongly support the Rocky Shores Strategy goal: "To protect the ecological values and coastal

biodiversity within and among Oregon's rocky shores while allowing appropriate use.”

Our members have long participated in Black Oystercatcher surveys, and so we know that rocky shorelines of Oregon’s South Coast host some of the richest and most important habitat for this beloved bird, an Oregon species-of-concern. Black Oystercatchers rely almost exclusively on rocky intertidal habitats to forage, as do our Black and Ruddy Turnstones and Surfbirds. Many of our offshore rocks (part of the Oregon Islands National Wildlife Refuge system) also host rocky intertidal habitat important for these shorebirds. They also host some of the largest seabird nesting colonies in Oregon. Clean cold water and upwelling make our ocean areas especially productive, and while these nesting seabirds generally forage on small fishes, the structure of rocky intertidal habitat, including algae and invertebrate life, are important for larger marine food webs that support birds, fish, and even whales. In addition, we are aware that our most remote shorelines host remarkable seaweed biodiversity, something that calls out for more study and seems particularly important at this time when changing ocean conditions have significantly impacted some species of marine algae. Many of these algal species have little known life histories.

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Because southern Oregon is an ecological transition zone between rocky shore invertebrate species communities from California ecosystems and those of the Pacific Northwest, there is highly valuable biodiversity in the intertidal zones in our local area.

In recent years, especially in this past pandemic year, we’ve noticed increased visitation to a number of formerly remote and little-known shoreline areas. As a result, in some places, we’ve seen new paths opened up, and an increase in plastic trash and human waste. Some of our members have reported removal of marine life, including mussels and seaweeds, and online videos specifically encouraging people to forage for limpets in still rich intertidal areas of the South Coast! We are aware that rocky shore habitats not far north up the coast have already been degraded by overuse and so we are concerned that these habitats on the south coast could become vulnerable.

In addition, Oregon’s marine life is already confronting some of the perils of the climate crisis, with the collapse of kelp forests in many areas. Our members have reported seeing invertebrates from deeper waters, in particular purple urchins and red and flat abalone, now up in shallower areas, seeking out food. In the intertidal zone. As a result, these animals are far more vulnerable to take by humans. And these are the kinds of animals that people notice. There may well be other marine invertebrates now at higher risk owing to changing ocean conditions.

To help protect our still-rich and unique marine ecosystems, we support designation for several key areas on the South Coast for greater conservation in the Oregon Rocky Habitat Management Strategy. In general, it seems that areas that already have protection of upland terrestrial habitats should merit strong consideration for rocky shores protection, too.

That said, we also have concerns that special designation could inadvertently draw greater attention, increased visitation, and more damaging uses to now remote and little-known areas. We urge you to carefully weigh the best practices and methods for conservation of these valuable marine resources, especially given that there now seems to be insufficient capacity for enforcement of rules our South Coast area—something we have seen with seasonal closures for western snowy plovers and other state laws. This has been especially pronounced in this pandemic year with so many state parks understaffed. We urge you to draw upon knowledge of other places, perhaps from north up the coast or from natural resource professionals with experience in other vulnerable marine environments, to inform the best approaches for proactively conserving outstanding rocky shores values on Oregon’s South Coast.

The most effective approach may be to actively direct visitors to “marine gardens” where tide pools or unique rocky habitat are most accessible rather than to highlight more remote, significant and pristine areas, as might happen with special designations marked on a map.

We recognize that this Rocky Shores Management Strategy public process is focused on designation of zones, but we appreciate some other important approaches to conservation of rocky intertidal areas that we urge the State to adopt together with designations. For example, we appreciate that Oregon has worked with NGO partners and has invested in providing for education and interpretation at some high use areas with vulnerable intertidal habitats; this

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approach may be invaluable not only for conserving those sites in particular but for others as well. And of course, having more state park rangers to patrol, talk to visitors, and keep an eye on rocky habitat areas at state parks, would also be very helpful to protecting our intertidal zones.

## **Proposals**

To help protect our still-rich and unique marine ecosystems, we support designation, we support the following designations:

### **Blacklock Point area as a Marine Conservation Area**

Our group has long been engaged with efforts to conserve the upland areas adjacent to the rocky shores of Blacklock Point, known as Floras Lake State Natural Area, a unique wild Oregon State Park that residents and visitors enjoy for its wildness, stunning views, unique ecological attributes—including highly unusual botany related to distinctive geology. The adjacent rocky shore and offshore areas are also unique, owing to unusual sandstone geology --with diverse rocky intertidal habitats, subtidal rocky reefs, kelp beds, and seabird colonies. Blacklock Point has been part of our Christmas Bird Count for 40 years, and is a place where people can

observe many species of seabirds in a remote setting, since it takes a good walk to reach overlook points and intertidal zones. Marine Mammals also use this area. In a 2005 report, the group Oceana recognized Blacklock Point as one of 31 Important Ecological Areas in Oregon. The current land use as a State Natural area is compatible with conservation, but there are areas where vandalism has occurred, for example on sand stone cliff walls north of the point. There has also been an increase in visitation to this remote area. We support the South Coast Rocky Shores Group proposal to designate Blacklock Point as a Marine Conservation Area.

### **Crook Point area as a Marine Conservation Area**

In the past, our group has engaged with efforts to conserve the seabird colonies adjacent to the rocky shores of Crook Point. Crook Point, including the Crook Point Unit of the Oregon Islands National Wildlife Refuge is located south of Pistol River State Park. Because the NWR is closed to the public and much of the south part of point is privately owned, access to the intertidal zone in this area is already constrained. It takes walking in from Pistol River State park more than one-half mile on a steep narrow beach (constrained by beach grass) —and then trespassing beyond closure signs —to reach this remote area, or obtaining special permission from the National Wildlife Refuge or private landowners.

For this reason, the rocky shores of Crook Point may host pristine and “reference quality” intertidal habitats. From what we understand, the area has a high concentration of diverse intertidal habitat types. Also the area from here south to the north end of Boardman State Park hosts high marine algae biodiversity. In addition, the nearshore rocks here have hosted some of the most significant colonies of Leach’s Storm petrels on the West Coast, and is recognized as an Important Bird Area. Marine mammals are also known to haul out here. In a 2005 report, the group Oceana recognized Crook Point as one of 31 Important Ecological Areas in Oregon.

The current upland uses of Crook Point are generally compatible with conservation of outstanding intertidal natural resources, but potential future development could put these values at high risk. We hope that MCA designation could help protect these resources into the future if it could help to require positive mitigation measures to avoid polluted runoff that would degrade and damage marine life. Ideally, this designation would not antagonize private property owners whose current land management is compatible with the high conservation values of the rocky intertidal zone; hopefully they will continue to derive benefit from hosting visitors who cherish the unique opportunity to access this remarkable and hard to reach rocky shore and beach area. We support the South Coast Rocky Shores Group proposal to designate Crook Point as a Marine Conservation Area.

### **Cape Blanco as a Marine Research Reserve**

The intertidal zone around Cape Blanco is also extraordinary. One of the westernmost points in the lower 48 states, Cape Blanco is an important geographic and topographic feature in our region —jutting out into the ocean so as to structure and demarcate populations of salmon and steelhead. Our members have enjoyed low tide field trips to explore this area with marine

biologists —learning about some of the remarkable and beautiful denizens of its intertidal zone. This rocky shore area is adjacent to the beloved Cape Blanco State Park, famous for its lighthouse, and so it is subject to greater visitation and potential impacts than other areas.

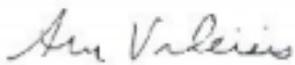
Cape Blanco has been the location of an important PISCO research site for over 30 years. Ongoing monitoring here helped scientists to recognize early on the sea star wasting disease that became so consequential for the entire West Coast.

We support PISCO's proposal to designate Cape Blanco as a Marine Research Reserve. This designation would help ensure that people can continue to enjoy the remarkable natural beauty of the site, but would preclude collecting of animals or algae. This will help the ecosystem remain intact for generations of citizens and visitors to come.

We appreciate the State of Oregon's proactive approach to marine conservation. Thank you for the opportunity to provide public input, and we look forward to learning more about this public process as it moves forward.

Sincerely,

Ann Vileisis  
President Kalmiopsis Audubon Society



A Proposed Marine Conservation Area: Crook Point December 9, 2020

CoastWatch

I am a Coos County resident; hiker; CoastWatch volunteer; Cape Arago Audubon Society Member and live within 100 miles of Crook Point. I am writing in support of the proposal for designation of the intertidal and subtidal rocky habitats at Crook Point and Mack Reef, as outlined in the proposed site polygon.

As we look to the future, we can prepare, protect and safeguard this wild place, while maintaining existing access to its natural coastal treasures for local residents, students and visitors. The world class ecological and natural aesthetic values of the rocky intertidal and subtidal areas are clear, as are the ecological services these rocky habitats contribute to economically important local fisheries.

The Crook Point uplands are a mainland unit of the Oregon Islands National Wildlife Refuge which also includes the offshore rocks and islands above the mean high water line. The rocky reefs and other submerged rocky habitats below require a comparable high level of protection

afforded by the proposed Marine Conservation Area (MCA) designation, to bolster coastal ecological resilience needed to reduce susceptibility to effects of sea level rise and other ongoing environmental impacts, and to maintain the ecological services necessary to help support the local fishing economy. The rocky intertidal shore similarly remains susceptible to impacts, is inadequately protected relative to the adjacent refuge areas, and requires the increased protections afforded by the MCA designation. Before Crook Point was purchased for conservation as a public benefit, it was one of the last privately owned undeveloped coastal headlands in Oregon. It is considered one of 31 Important Ecological Areas in Oregon, as defined in a 2005 report on the Oregon coast by Oceana. It is important to note that while the Crook Point refuge uplands are closed to the public, the beach is publicly accessible at low tide from the north and from the water by kayak and canoe.

Crook Point was identified for special management protections as a Habitat Refuge in a 1994 plan, but this was never implemented. The MCA designation will provide the required level of protection to match the high resource values of rocky habitats at the site.

I strongly encourage you to approve the proposed Marine Conservation Area designation for Crook Point.

Sincerely,

Mike Mueller  
335 Miller Street, Lakeside, Oregon 97449  
541-514-6587

\* I volunteered for the Oregon Islands F&WS for 2 years and helped maintain the roads & trails located at this site. Crook Point is the most incredible west coast location I've had the pleasure of experiencing. This wonderful point needs to be protected forever from all human impact!

12/9/2020

To whom it may concern:

As a Brookings resident and Crook Point “neighbor” I am writing in support of the proposal for designation of the intertidal and subtidal rocky habitats at Crook Point and Mack Reef, as outlined in the proposed site polygon.

Protections and safeguards for Crook Point, and all of Oregon’s wild places, are essential all the while maintaining existing access to its natural coastal treasures. The world class ecological and natural aesthetic values of the rocky intertidal and subtidal areas are clear, as are the ecological services these rocky habitats contribute to economically important local fisheries.

The Crook Point uplands are a mainland unit of the Oregon Islands National Wildlife Refuge, which also includes the offshore rocks and islands above the mean high water line. The rocky reefs and other submerged rocky habitats below require a comparable high level of protection afforded by the proposed Marine Conservation Area (MCA) designation, to bolster coastal ecological resilience needed to reduce susceptibility to effects of sea level rise and other ongoing environmental impacts, and to maintain the ecological services necessary to help support the local fishing economy. The rocky intertidal shore similarly remains susceptible to impacts, is inadequately protected relative to the adjacent refuge areas, and requires the increased protection afforded by the MCA designation. Before Crook Point was purchased for conservation as a public benefit, it was one of the last privately owned undeveloped coastal headlands in Oregon. It is considered one of 31 Important Ecological Areas in Oregon, as defined in a 2005 report on the Oregon coast by Oceana. It is important to note that while the Crook Point refuge uplands are closed to the public, the beach is publicly accessible at low tide from the north and from the water by kayak and canoe.

Crook Point was identified for special management protection as a Habitat Refuge in a 1994 plan, but this was never implemented. The MCA designation will provide the required level of protection to match the high resource values of rocky habitats at the site.

Again, I strongly encourage you to approve the proposed Marine Conservation Area designation for Crook Point.

Thank you.

Sincerely,

Harry Freiberg

610 Mardon Ct.

Brookings, OR 97415

541 469 9879

[hap@alumni.stanford.edu](mailto:hap@alumni.stanford.edu)

December 11, 2020

To whom it may concern,

As a Brookings resident I'm writing to ask that Crook Point be approved as a Marine Conservation Area. Please preserve, observe, and let us learn to respect the intelligent life around us.

Sincerely,  
Jean DeCato  
96052 Foxglove Way  
Brookings OR  
541-661-0288  
[jeandecato@gmail.com](mailto:jeandecato@gmail.com)

December 10, 2020

To whom it may concern:

I am a former 27-year Gold Beach, Curry county resident, currently living in neighboring Del Norte County, California. I am a retired U.S. Forest Service Forest Technician, a CoastWatch volunteer, a University of Washington COASST volunteer, an Audubon Society member, a hiker, a birder and an advocate for open spaces that are vanishing due to increasing development. I am writing in support of the proposal for designation of the intertidal and subtidal rocky habitats at Crook Point and Mack Reef, as outlined in the proposed site polygon. I believe it is critically important to protect ocean habitats and coastal shorelines from encroaching development and population impacts such as over-fishing.

In the past I visited Crook Point with my co-workers, a U.S. Forest Service wildlife biologist and U.S. Forest Service botanist to observe offshore nesting birds, specifically Tufted Puffins. My botanist co-worker and friend was a lifelong resident of Pistol River and her parents were pioneer Pistol River ranchers. Because Crook Point was always a part of her pioneer community she had a pioneer homesteader's emotional attachment to the place in addition to professional interest. She and I were thrilled to be able to accompany the wildlife biologist as he counted birds at Crook Point. For me it was the opportunity to visit a wild and unspoiled coastal shoreline, see rare puffins flying around the offshore rock and appreciate an Oregon treasure spot.

As we look to the future, we can prepare protect and safeguard this wild place, while maintaining existing access to its natural coastal treasures for local residents, students, and visitors. The world class ecological and natural aesthetic values of the rocky intertidal and

subtidal areas are clear, as are the ecological services these rocky habitats contribute to economically important local fisheries.

The Crook Point uplands are a mainland unit of the Oregon Islands National Wildlife Refuge, which also includes the offshore rocks and islands above the mean high water line. The rocky reefs and other submerged rocky habitats below require a comparable high level of protection afforded by the proposed Marine Conservation Area (MCA) designation, to bolster coastal ecological resilience needed to reduce susceptibility to effects of sea level rise and other ongoing environmental impacts, and to maintain the ecological services necessary to help support the local fishing economy. The rocky intertidal shore similarly remains susceptible to impacts, is inadequately protected relative to the adjacent refuge areas, and requires the increased protection afforded by the MCA designation. Before Crook Point was purchased for conservation as a public benefit, it was one of the last privately owned undeveloped coastal headlands in Oregon. It is considered one of 31 Important Ecological Areas in Oregon, as defined in a 2005 report on the Oregon coast by Oceana. It is important to note that while the Crook Point refuge uplands are closed to the public, the beach is publicly accessible at low tide from the north and from the water by kayak and canoe.

Crook Point was identified for special management protection as a Habitat Refuge in a 1994 plan, but this was never implemented. The MCA designation will provide the required level of protection to match the high resource values of rocky habitats at the site.

I strongly encourage you to approve the proposed Marine Conservation Area designation for Crook Point.

Sincerely,

Melissa McDowell  
1291 Reddy Ave., Crescent City, CA 95531  
707-951-3857  
Mmcdowell1955@charter.net

**William Gorham, Ph.D.**

14834 Oceanview Dr.  
Brookings, OR 97415

13 December 2020

To whom it may concern:

I am a Curry county resident, a marine biologist by training and vocation, the Co-facilitator for Coastal SOCAN (Southern Oregon Climate Action Now), and member of the Board of Directors and the Chair for the Environment Subcommittee for OCEAN (Oregon Coast Energy Alliance Network). I've supported the protection of marine coastal areas for my entire life since vacationing in Maine in the 50s. With this letter, I'm writing in support of the Crook Point

proposal recommending a Marine Conservation Area (MCA) designation. I have lived and worked in coastal areas from the tropics to the arctic, in all the oceans save the Antarctic, and on both rocky headlands and protected sandy beaches. I know well the incredible value that protected marine areas provide to the marine ecosystem, but also to us humans dependent on our ocean.

As we look to the future, we can prepare protect and safeguard this wild place, while maintaining existing access to its natural coastal treasures for local residents, students, and visitors. The world class ecological and natural aesthetic values of the rocky intertidal and subtidal areas are clear, as are the ecological services these rocky habitats contribute to economically important local fisheries.

The Crook Point uplands are a mainland unit of the Oregon Islands National Wildlife Refuge, which also includes the offshore rocks and islands above the mean high-water line. The rocky reefs and other submerged rocky habitats below require a comparable high level of protection afforded by the proposed MCA designation, to bolster coastal ecological resilience needed to reduce susceptibility to effects of sea level rise, ocean acidification, and other ongoing environmental impacts, and to maintain the ecological services necessary to help support the local fishing economy. The rocky intertidal shore similarly remains susceptible to impacts, is inadequately protected relative to the adjacent refuge areas, and requires the increased protection afforded by the MCA designation. Before Crook Point was purchased for conservation as a public benefit, it was one of the last privately owned undeveloped coastal headlands in Oregon. It is considered one of 31 Important Ecological Areas in Oregon, as defined in a 2005 report on the Oregon coast by Oceana. It is important to note that while the Crook Point refuge uplands are closed to the public, the beach is publicly accessible at low tide from the north and from the water by kayak and canoe.

Crook Point was identified for special management protection as a Habitat Refuge in a 1994 plan, but this was never implemented. The MCA designation will provide the required level of protection to match the high resource values of rocky habitats at the site.

I strongly encourage you to approve the proposed Marine Conservation Area designation for Crook Point.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Gorham".

William Gorham, Ph.D.

805-377-9336

[Gorham.bill@gmail.com](mailto:Gorham.bill@gmail.com)

December 15, 2020

To whom it may concern:

I am a Coos Bay resident & CoastWatch volunteer. I live within 90 miles of Crook Point & 50 miles of Rocky Point. I am writing in support of the proposal for designation of the intertidal and subtidal rocky habitats at these places, as outlined in the proposed site polygon. As we look to the future, we can prepare, protect and safeguard this wild place, while maintaining existing access to its natural coastal treasures for local residents, students, and visitors. The world class ecological and natural aesthetic values of the rocky intertidal and subtidal areas are clear, as are the ecological services these rocky habitats contribute to economically important local fisheries.

The Crook Point uplands are a mainland unit of the Oregon Islands National Wildlife Refuge, which also includes the offshore rocks and islands above the mean high water line. The rocky reefs and other submerged rocky habitats below require a comparable high level of protection afforded by the proposed Marine Conservation Area (MCA) designation, to bolster coastal ecological resilience needed to reduce susceptibility to effects of sea level rise and other ongoing environmental impacts, and to maintain the ecological services necessary to help support the local fishing economy. The rocky intertidal shore similarly remains susceptible to impacts, is inadequately protected relative to the adjacent refuge areas, and requires the increased protection afforded by the MCA designation. Before Crook Point was purchased for conservation as a public benefit, it was one of the last privately owned undeveloped coastal headlands in Oregon. It is considered one of 31 Important Ecological Areas in Oregon, as defined in a 2005 report on the Oregon coast by Oceana. It is important to note that while the Crook Point refuge uplands are closed to the public, the beach is publicly accessible at low tide from the north and from the water by kayak and canoe.

Crook Point was identified for special management protection as a Habitat Refuge in a 1994 plan, but this was never implemented. The MCA designation will provide the required level of protection to match the high resource values of rocky habitats at the site.

I strongly encourage you to approve the proposed Marine Conservation Area designation for Crook Point.

Sincerely, Brent Lerwill, Charleston, Oregon

## **Crook Point**

Jay Withgott | [withgott@comcast.net](mailto:withgott@comcast.net) | 97219

The two of us have made a number of visits at low tides to locations in the immediate vicinity of Crook Point for tidepool study. One spot we visited just three miles south of here was where UC Santa Barbara biologist Jeffrey Goddard in 1990 found a whopping 41 species of nudibranchs. The stretch of coast in this area is one of our favorites in all of Oregon. The abundance and relative health of rocky coast habitats along the Samuel Boardman State Scenic Corridor, from around Crook Point all the way down to Brookings, means that the rocky intertidal communities are more intact and diverse than in most other areas of the Oregon coast. In addition, the southerly latitude gives this region some marine and coastal species not found further north on the

coast. We personally have encountered several species of nudibranchs and other invertebrates in this region that we have not encountered elsewhere. Likewise, the diversity and abundance of seabirds along this stretch of coast is notable. My fairly extensive birding from shore has turned up regularly high numbers of alcids. And birding from cruise ships at a distance of 30-50 miles offshore has revealed that the offshore waters of Curry County tend to have somewhat higher numbers and densities of pelagic birds than the waters off other Oregon counties. Bird populations are often a reflection of their food supply, and the marine life of this region is clearly rich enough to support many seabirds.

The region around Crook Point and southward has so far remained “undiscovered” for many Oregonians, but as population and recreation pressures escalate here, coastal impacts will intensify. The time for safeguarding key areas of importance for marine and coastal habitat is now, while ecological communities are still somewhat intact and before development and demands for more intensive use of the land and sea increase further.

Dr. Susan Masta  
Biology professor, Portland State University

Jay Withgott  
Environmental science textbook author

## **Subject: Designation of Crook Point as a Marine Conservation Area**

**Submitted by: Nancy C. Treneman Dec. 10, 2020**

I am a marine biologist and have conducted seaweed, marine invertebrate and marine debris surveys at Crook Point since 2008. The intertidal zone at Crook Point is unique in the diversity of habitats within a small area and the diversity of marine species in these habitats. In addition, harbor seals, river otters, and a variety of sea bird utilize the rocky intertidal.

Nudibranchs (often known as ‘sea slugs’) are very sensitive to changes in water quality, temperature, and habitat degradation and can be thought of as the ‘canaries’ of the intertidal zone. They are specialized predators on sensitive species, and therefore when their prey is gone, so are they. I survey for nudibranchs at over 15 sites from Crescent City to Cape Arago. The nudibranch diversity at Crook Point (currently 35 species) is rivaled only by Boardman State Park (north end) and N. Cove, Cape Arago.

Crook Point beaches are difficult for the general public to access; this makes the site an excellent 'baseline' for comparison to high use areas such as Rocky Point (Port Orford) and Lone Ranch (Brookings). I have long standing transects for seaweed and invertebrate diversity surveys at all three locations.

Crook Point currently enjoys isolation from heavy public use already. In over 50 visits to this site since 2008 I have observed beach walkers, clamming and abalone hunting and bicycle riders only a handful of times. Although motorized vehicles are illegal on this stretch of beach, I observed an ATV driving on the beach on one occasion (2009). The near shore is worked by fishing boats, and on one occasion I saw kayakers between and near the rocks. It is my view that the residents of adjacent homes are generally respectful of the environment and have little impact on the health of the intertidal.

However, in the future, development may be proposed on adjacent lands. In 2009 a proposal for an extensive golf resort was put forth by local land owners. This would likely impact the intertidal zone by degrading environmental parameters and increasing direct human impacts. Silt, Pesticides, herbicides, and bacterial pollution would reach the intertidal zone through the water table, creeks and run off. A decrease in water quality affects the larvae and adults of many species; including those of economic value such as rockfish, sea urchins, and Dungeness crab.

A substantial increase in direct human impact through trampling, garbage, take of marine invertebrates, and disturbance of marine mammals and birds would occur with the presence of resorts, hotels, and/or an increase in residential homes. I have observed multiple instances (not at Crook Point) of illegal harvest of marine invertebrates and seaweed, sometimes in large amounts to eat or to create art work, some of which is sold commercially. I have seen people abuse and kill marine organisms for no reason, and/or put them into jars to take home in a hot car. Many marine species have long lifespans: the elegant anemone lives over 100 years. Long life spans indicate low reproductive success per year. With this in mind, the removal of a few individual starfish, sea urchins, or snails has a significant impact on recruitment (the number of young entering the population) and therefore the complex marine food web.

Designating Crook Point as a MCA may protect it in the future, if the designation requires developers to put in place and enforce protective measures, monitoring, and mitigation of the intertidal zone and offshore rocks.

However, it may also have some negative impacts. It is important that the local residents continue to enjoy the beach as they do now. If the designation requires an

increase in educational visits of large numbers of people then trampling could increase significantly. Designation may call attention to the site, which may motivate people to visit it. The public can get onto refuge land from the north side of the Point; there is a trail from the highway to the north side. I usually walk on the beach north of the Point at least once a week, and have observed this many times over the years.

The area offers unique research opportunities. The tiny and rare group, the Ear Snails (Velutinidae), are one of my fields of study. Crook Point is one of two sites where all 6 species resident in southern Oregon are found. This year (2020) I found a young *Pycnopodia helianthoides* (Sunstar), a species decimated by disease and expatriated from much of its historic range. After 10 years of surveys all along the southern coast, I finally found 1<sup>st</sup>-year recruits of the Gumboot Chiton (*Cryptochiton stelleri*) at Crook Point in 2013.

Research studies require a small amount of take for taxonomic, genetic, and laboratory investigations. I have a collection permit through NOAA for research take, and I hope that the MCA designation will not require additional permits. It is important that the MCA designation allows for scientific activities and specimen collection.

In summary, a MCA designation for Crook Point would be beneficial if it confers protection from development in the future, and retains the option for scientific research, including the collection of specimens when necessary. At the same time, I have concerns that the designation would create an antagonistic relationship with current residents if their use of the area is restricted. If, by becoming an MCA, Crook Point became a 'destination' in the eyes of the public, and/or it required a number of large group activities in the intertidal, the protections imparted by the designation could be negated by these impacts.

The beauty of the rocks, intertidal zone, and surrounding land is enough to make Crook Point an amazing place. This beauty combined with the diversity of seaweed, marine invertebrates and habitats, make it one of the most important rocky intertidal sites on the southern Oregon Coast.

With Best Regards,

Nancy Treneman

A handwritten signature in black ink that reads "Nancy Treneman". The signature is written in a cursive, flowing style.

Oregon Institute of Marine Biology  
University of Oregon

[ntreneman@gmail.com](mailto:ntreneman@gmail.com)

541 698 0076