

Rocky Habitat Proposal Working Group Evaluation

The Rocky Habitat Management Strategy Initial Proposal Period (June – December, 2020)



Working Group Evaluation

Evaluation by the Rocky Habitat Working Group is intended to be a merit-based process, the final product of which is a packet of recommended proposals and other evaluation materials that is forwarded to OPAC. Following the Agency Feasibility and Completeness Analysis, rocky habitat site designation proposals are forwarded to the Working Group, which will review them and sort them as “**Recommended**” or “**Not recommended**”. Recommended proposals will be made available for a formal 30-day public comment period, after which the Working Group may modify the recommendation prior to submitting the full packet of materials to OPAC for review. The following summary is an aggregate of the rocky habitat proposal evaluations conducted by the Working Group in winter, 2021.

Site Information

Proposed site location: [Blacklock Point](#)

Designation category:

Marine Research Area

Marine Garden/Education Area

Marine Conservation Area

Is this a proposal to *add*, *delete*, or *modify* a rocky habitat site designation?

New Site Designation (addition)

Existing Site Removal (deletion)

Alteration to Existing Site

Name of principle contact: [Larry Basch](#)

Affiliated organization(s): [South Coast Rocky Shores Group](#), [Oregon Shores Conservation Coalition](#)

Date of proposal submission: [December 30, 2020](#)

Evaluation Criteria Matrix

The following rubric is a simplified way to objectively evaluate key aspects of rocky habitat site designation proposals that can be assessed categorically. The criteria listed below largely correspond with each section of the proposal questionnaire form. This rubric should be used to evaluate how well the components of the proposal come together, rather than evaluating answers to individual questions in isolation. The rubric can also be used to compare reviewer evaluations and ensure consistency of interpretation across reviewers, and across proposals over time. While this matrix can aid in making final recommendations, as this is a merit-based process, it should not be the *only* criteria by which a final determination is made. As part of the Initial Proposal Process, this is a pilot effort and therefore subject to change for future iterations of the evaluation process.

For each of the criteria below, indicate your selection and add notes as you see fit.

Criteria	Does not meet criteria	Has merit, needs work	Meets criteria
Goals, objectives, or other criteria for site success should be clearly stated and reasonably achievable.		X – Well stated and reasonably achievable, conservation criteria for site success needs further work.	
Measurable results and outcomes should be reasonably measurable and achievable.			X – Well outlined, measurable and achievable with local and state fiscal investments
Site Uses should be characterized appropriately, with reasonable expectations for potential impacts.			X – Site uses were well characterized. Reasonable (no) regulatory impacts. Unintended increased use and cultural uses may need further discussion, dangerous site for access, especially in winter. Ability to interact with visitors will be limited.

<p>Key Natural Resources, should be characterized appropriately, including features, values, and anticipated impacts.</p>			<p>X – Well characterized and good discussion of history, existing uses, values, etc.</p>
<p>Regulations & Enforcement should be clearly stated with reasonable expectations.</p>		<p>X – No regulatory enforcement given beyond volunteer monitoring, no regulations recommended. Challenging site access, especially in winter, may present monitoring and enforcement challenges.</p>	
<p>Non-Regulatory Management Mechanisms should be clearly stated with reasonable expectations.</p>		<p>X - These were mostly clearly stated (some left to be planned), highly ambitious, some further development of plans for accountability, support, and timelines for program that does not yet exist. OPRD may lack capacity to support.</p>	
<p>Stakeholder Engagement should be characterized appropriately, and include clear and actionable outreach.</p>		<p>X – The proposer put forth a good effort to engage a variety of stakeholders in development. However, the demographic of the area and the nature of access at the site may prove extremely challenging for ongoing and future stakeholder engagement.</p>	

<p>Additional Information should provide relevant context.</p>			<p>X – Mostly relevant, some additional information may be beyond the scope of the TSP3.</p>
<p>Goals, objectives, management principles, and policies within TSP3 should be adequately addressed and/or advanced.</p>		<p>X – Questions on intent of proposal w/respect to upland activities and Policy R.</p>	
<p>Designation and associated changes to regulatory standards or and management practices should be appropriate for the site and reasonably effective to achieve the stated goals.</p>		<p>X – The goals and objectives are highly educational for a conservation designation. No proposed regulations; will conceivably rely solely on education to achieve outcomes. This isn't untenable, but thoughtful consideration should be given to long-term goals of the site.</p>	

Questions

Please fill in information and answer the questions below for *each* rocky habitat site designation proposal, and provide a brief summary of your thoughts at the end. Please provide additional information, interpretation, concerns, or context where necessary.

Working Group Evaluation Questions

1. Please answer the following based on the proposed site designation category:

Marine Conservation Area:

- a. What are the primary conservation priorities or concerns at this site (i.e. species, habitats, public use, etc.)? *On-site human caused disturbances, threats, or impacts to marine resources, drones, or by uncontrollable off leash dogs - of pinnipeds, other marine wildlife, seabird breeding colonies, Black Oystercatchers, other sea- and shore-birds utilizing rocky habitats especially during nesting season (April - August), or from trampling rocky intertidal organisms, overharvest, protecting canopy-forming kelp beds, ocean-climate conditions, biodiversity.*
 - b. What are the specific management objectives relating to the concerns above?
 - c. What are the proposed management measures to help reach these objectives? What is the provided rationale for these measures, and is it appropriate? *All non-regulatory management measures – education, collaboration, citizen science monitoring, interpretation, etc.*
 - d. In what ways would the proposed site management prescriptions limit adverse impacts to habitat and/or wildlife? *Given no regulatory management prescriptions, adverse impacts to wildlife are speculative based on visitor intercept with volunteer programs, increased signage may help make visitors more aware and informed of their role in limiting adverse impacts to habitat and wildlife, adaptive management and monitoring of activities and impacts over time may support limited adverse impacts*
2. Regarding the site map(s) provided:
 - a. Is the polygon appropriate for the location (e.g. size, shape, placement, etc.)? *Yes, however the inclusion of the steep cliffs adjacent the sandy shoreline on the northern boundary may need further evaluation.*
 - b. Does it reflect the goals or intentions of the proposal? *Yes, but in general the site is not the safest to access and it's remote nature make it a challenging site for engagement.*
 - c. What are the strengths and/or weaknesses of this particular shape and placement? *Unique site, includes a variety of ledge and rock shelves, cliffs, intertidal and subtidal, not particularly ecologically rich but culturally significant with stronger heritage. Use is low already and the site is difficult to access, long walk from parking (safety).*

3. Are the goals and objectives of the proposal clearly stated, and what are their strengths and/or weaknesses? Clearly stated. The goals rely heavily upon the collaborative capacity of local community groups and volunteer programs – this is both a strength and a potential weakness of the proposal.
4. Will the proposed criteria to evaluate site goals, objectives, or success, be reasonably measurable or achievable? How effective will they be? These described non-regulatory management measures via volunteer programs are generally already overstretched and at max capacity so additional funding and capacity will be critical to any success in long-term measures. Progress metrics are described, but in the event that these metrics are not met, there may be some need for detailing expectations/outcomes. In short, who is leading all of this, the proposer, an agency, etc.?
5. How does the proposal change the status quo of management protections at this site? What are the implications of this change as you see it? The management protections are all non-regulatory in nature, thus the proposal doesn't actively change the status quo of current management. The proposal relies upon the leadership and coordination of a collaborative capacity, largely volunteer, to change any status quo management protections.
6. The rocky habitat site proposal process focuses on allowing for adaptable and holistic management at the site level and is not intended to manage on a species-specific level. With this in mind, are the proposed regulatory goals, objectives, outcomes, or changes appropriate for this process? Yes
7. Does the proposal indicate whether any of the desired outcome(s) cannot be met with a site designation proposal? (If so, proposers are encouraged to outline their concern or desired regulatory change in a formal letter to OPAC.) No
8. Is there any relevant historical or institutional context to this proposed site designation that should be taken into consideration? No. The proposal details some past quarry activity at the site and other upland activities such as sheep-grazing, logging and various proposed development activities, but nothing exactly in the context of the site designation.
9. In what ways does this proposal address and/or further the goals, objectives, management principles, and policies within the Rocky Habitat Management Strategy and/or the TSP writ large? The proposer provides strong linkages between the TSP3 goals, objectives, management principles, and policies within the proposed designation throughout pg 40-42 of the proposal. These are clearly stated and the ability to further these objectives depends upon the aforementioned executed leadership and local capacity developed from the designation and fully vested in the site management.
10. How would designating this site fit into the broader context of the currently designated rocky habitat sites, and coastwide rocky habitat management?

- a. Are there other site designations proposals at or near this site that may overlap, interact with, or support this one? If so, what and where are they? No – there is another proposal for a Marine Research Area south at Cape Blanco which has long-term monitoring and an arguably more diverse presentation of rocky habitats. If volunteer programs are established, they would coordinate to support both sites. Upland is part of Floras Lake Natural Area.
 - b. What are the potential links, considerations, or conflicts between them? There may be some ecological links for some species although likely minor. Cape Blanco to the south represents the beginning of a major ecoregion, distinct from that to the north in oceanography, species distribution, etc.
 - c. In what ways does this proposed site designation differ from other proposals that overlap or interact with it? N/A
11. How might this site designation interact or fit in with the broader coastwide regulatory and management context of all habitats, resources, and designations? As with all rocky habitats under the TSP3, coastwide regulatory and management applies to this site with or without the proposed designation. It adds no further regulatory management, thus the site may be more of a paper exercise in protection or a human exercise in outreach/awareness.
12. What, if any, practical feasibility concerns might you have about implementing the proposed site designation? Some of the educational and monitoring activities may not be feasible in the winter months when site access is extremely challenging. Remote nature of the site presents some, not insurmountable, challenges and feasibility concerns for monitoring, enforcement and education – these may include safety concerns. Addition of the designation may add burden to state park managers in an area that currently doesn't require heavy presence.
13. What are the organizational partnerships involved in this proposal? In what ways have those partnerships contributed to development of this proposal?
The South Coast Rocky Shores Group and CoastWatch. While there was much outreach demonstrated to Tribes, government, NGOs, and local stakeholder groups, it wasn't apparent which of those groups were actively involved in the development of the proposal. The proposal does seek to build on existing partnerships and wholly relies on those partnerships for implementation (see "Using Partnerships to Implement Site Goals").
14. Are there any additional materials or documents provided? If so, what are they and what is their purpose? Yes – the proposer provided many additional materials and documents, generally existing model programs, state and local planning, reference to nearshore strategy, OARs, etc. Supporting information was appropriate.
15. Are there any additional site considerations that should be noted? Surrounding upland area has been proposed several times for development projects including a destination resort and golf course. Northern boundary of proposed area includes steep cliffs adjacent a sandy beach.

Site Attributes and Reports

Geography

16. Briefly describe how appropriate the area and length of shoreline in the proposed polygon sketch are for the selected designation category and the stated goals. *See above, northern boundary may need additional consideration.*

Physical

17. Briefly describe how appropriate the distribution of habitat features (such as offshore islands & rocks, substrate types, etc.) in the proposed polygon sketch is for the selected designation category and the stated goals. *Appropriate, however I was surprised the site did not include further rocky habitat to the west and north that included some patchy subtidal kelp beds.*
18. In what ways does the proposal appropriately address, reflect, or account for the risks associated with potential future sea level rise scenarios? *While Sea Level Rise (SLR) is a virtual certainty coastwide, the proposer has "not determined any specific risks associated with SLR at the proposed BP MCA in terms of human safety or threats to habitats or resources. This said, long term effects of SLR are likely to include gradual upward vertical shifts in the distribution and abundance of rocky intertidal organisms, particularly sessile species, and a corresponding increase in the area and volume of nearshore shallow subtidal habitat adjacent to the low intertidal zone that could be colonized by shallow subtidal species as sea level rises. We will work with knowledgeable individuals to develop and implement related metrics."*

Biological

19. How well represented by the proposed polygon sketch are the species and/or habitats of interest that are mentioned in the proposal? *Small kelp beds, anecdotal pinniped haulout, seabird colonies, small area along northern intertidal biologically diverse. Compared to some of the other areas around, the biology of this site, while very well represented, is not as significant at some of the rocky habitat areas to the south, particularly south of Cape Blanco. The proposer does an excellent job accounting for and providing a list of known and observed flora and fauna in the area.*
20. How appropriate is the selected designation category and stated goals for the protection of the species and/or habitats of interest? *Appropriate, but limited regulatory management mechanisms while maybe not necessary today, create some conflict with consistency the Working Group was striving for in new designation categories.*
21. Are there other species, habitats, or natural resources of relevant management concern that were overlooked by this proposal, or could be negatively impacted by the proposed designation? *No*

Human Uses

22. What are the most likely human use activities to impact, or be impacted by, the selected designation category and the stated goals? Has the proposer demonstrated how they expect these uses to change in the future? Visitor intercept with volunteers, stewardship activities may lend to improved site, and designation will likely lead to increased recognition and site use, and potentially increased use as well.
23. In what ways are the selected designation category and stated goals appropriate for the kinds of human use activities known to occur within the proposed polygon sketch? Appropriate. Some current users have raised concerns about current or future impacts on resources and uses. The new designation does not recommend any restrictions on uses, however, proposes monitoring measures to adaptively manage these uses into the future and get “ahead of the curve of the inevitable increase” in human use activities and the likely impacts to the site from those increased uses.
24. Are there other human use activities not mentioned in the proposal or site report(s) that could be of relevant management concern for the proposed polygon sketch? No.

Evaluator Comments and Feedback

In the space below, please provide a (brief) summary of your thoughts on the merits of the proposal, and your rationale for recommendation. If more space is required, please attach additional pages.

The proposal itself had many merits on paper with respect to aligning with the Rocky Habitat Management Strategy and providing generally strong rationale for non-regulatory management measures. However, the significance of the site in a coastwide context as an MCA, in the absence of management recommendations, is difficult to reconcile and presents some challenges for implementation.

A remote area that is well-loved and accessed by a local few, this site represents more of a cultural/heritage significance than perhaps ecological and educational significance. As a remote site, its goals for education and engagement will be challenging, and safety and seasonality access issues may limit these opportunities to meet the associated site goals. This may also present monitoring limitations. With no volunteer program in place, and no consistent independent funding sources identified, the success of non-regulatory management measures will depend on the leadership and capacity of local citizens.