From:	Kent Doughty
To:	TSP comments
Subject:	ASLC public comment for February 26 working group meeting
Date:	Friday, February 26, 2021 1:52:15 PM

These comments are being submitted as part of the public record for the February 25-26, 2021 Working Group meeting.

Concern was expressed that clarification was needed regarding the proposals for Cape Lookout and Cape Foulweather. Specifically, the Department of State Lands (DSL) expressed concern that the proposals were obligating that agency to conduct monitoring within kelp beds. I am clearly stating that the proposal does not call upon DSL to do monitoring nor does the Audubon Society of Lincoln City (ASLC) have any expectations for DSL to conduct monitoring at either site.

Potential cooperators are listed with each recommendation to indicate key stakeholders. The proposals clearly state that listing potential cooperators does not imply a commitment or endorsement of the proposal.

It is our intent that our proposals be value-added opportunities through community engagement rather than create unfunded mandates for the agencies. ASLC has a proven track record for managing and implementing volunteer programs including education and community science.

Biological monitoring recommendations at Cape Lookout are limited to community science efforts within intertidal habitats as we felt monitoring within subtidal kelp beds is beyond the capacity of a volunteer program. We are enthusiastic to learn that the Oregon Kelp Alliance is considering Cape Lookout as a focus area for its monitoring efforts. Recommended monitoring at Cape Foulweather relies upon ongoing monitoring that ODFW does as part of its marine reserve comparison studies as well as Audubon initiated community science efforts.

Both proposals do acknowledge the need for regional monitoring needs that are already stated in the Nearshore Conservation Strategy to address climate change and invasive species concerns. The proposals note that implementation is subject to agency funding and allocation of both agency and academic resources. It is also noted that these are long-term goals with no expectation for near-term implementation. Acknowledging these critical concerns does not imply a commitment but simply underscores the importance of addressing them within the Rocky Habitat Management Strategy.

Additional clarifications include:

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The Cape Lookout proposal has a letter of support from the Boy Scouts of America. We have had extensive outreach with them and they are enthusiastic about this proposal.

- Covid has made outreach very challenging. In recent months we have had and continue to have outreach with several charter boat operators out of Garibaldi as well as several individuals within the Pacific City Dorymans' fleet. We welcome their engagement in these proposals. Nothing in our proposal restricts boat access or anchorage but ASLC does not have the authority to guarantee access into perpetuity.

- ASLC will address additional considerations noted by the working group during the public comment period.

After reading these clarifications, ASLC hopes that the working group will reconsider its recommendations for these two sites today at the February 26 meeting.

Respectfully,
Kent Doughty
ASLC Rocky Habitat Campaign Coordinator