

Rocky Habitat Site Proposal Initial Recommendation

The Rocky Habitat Management Strategy Initial Proposal Process (2020-2021)

Proposed Site

Site Name: Blacklock Point Marine Conservation Area

Site Map: http://seasket.ch/y0uvvr4X_7

Proposal Materials: <https://bit.ly/3kPXKdX>



Initial Recommendation

This document is a draft summary of the site proposal evaluations conducted by the Rocky Habitat Working Group. The final drafts will be included in a recommendation packet that will be forwarded to the Ocean Policy Advisory Council (OPAC).. The summary below represents an initial draft of the recommendations made by the Working Group for Blacklock Point Marine Conservation Area. Proposal recommendations will be made available for a 30-day public comment period, during which proposers and other members of the public are invited to submit their feedback. The Working Group will review the feedback for consideration prior to making their final recommendation determinations.

Initial recommendations were crafted using a ranking system whereby the members of the Working Group entered a vote for each proposal where 1 = *Recommend*, 2 = *Recommend, with considerations*, 3 = *Reservations, even with considerations*, and 4 = *Do not recommend*. Consideration are those components of a proposal, identified through the evaluation process, which must be addressed to facilitate its implementation. A vote of modified consensus was agreed upon where no more than 20% of the voting Working Group members could vote *Do not recommend* (4) in order for a proposal to receive a recommendation to move forward for consideration by OPAC.

Average Vote Ranking: 3.2

Initial Recommendation: Recommend, with considerations

Summary of Considerations

The Rocky Habitat Working Group identified the implementation considerations listed below for the proposed Blacklock Point Marine Conservation Area. Any potential recommendation from OPAC should address these considerations as outlined in the following summary to ensure that implementation of the proposed site is a) consistent with state agency authority and coastal policy, b) appropriately inclusive and representative of stakeholder interests, c) reasonably achievable within the existing framework of rocky habitat site management, and d) in balance with the merits and goals of the proposed site.

Any potential recommendation for implementation of this site should address the following considerations:

- Management changes with respect to status quo, balance between site goals and use, upland management
- Challenges to stewardship program implementation (e.g. access, enforcement, infrastructure, agency capacity, support)
- Reconciliation of boundaries with respect to statutory vegetation line (SVL), inclusion of northern cliffs

Blacklock Point represents the northernmost extent of the Klamath Mountains geomorphic province, as evidenced by the nearly mile-and-a-half of dramatic sheer cliffs on its north side. The original 1994 Territorial Sea Plan identified the site as “Not Yet Designated”, and recognized its connection to nearby Cape Blanco. While the views at Blacklock Point may be well-known along the south coast, it is remote and site access is limited. Visitors typically will access the site from either a 1.5 mile trail through Floras Lake State Natural Site, a 2 mile walk along the beach from the north, or a 1 mile walk from along the beach from the south, near the mouth of the Sixes River. While the views are stunning and the rocky habitats notable, access to the site remains challenging. Consequently, site visitation is very low, which lends some level of *de facto* protection.

The concerns expressed in the proposal are primarily focused on wildlife disturbance such as impacts to seabird nesting success and harbor seal haulouts, habitat protection, and ecosystem-based management. Sensitive archeological resource sites are also present, and there is some traditional use at the site by local Tribal Nations. Site goals are focused on conserving the ecological aspects of the site through site-based volunteer stewardship programs including education, interpretation, citizen science, and monitoring. The proposal does an excellent job of identifying key natural resources in the area, with an extensive characterization of kelp, seabirds, pinnipeds, and intertidal organisms. It also provides a good discussion of history, existing uses, site values, and many other aspects of the area.

The proposal does not recommend any restrictions on uses, but rather proposes non-regulatory management mechanisms to adaptively manage these uses into the future in the face of increasing human use activities and their impacts. Management would largely be achieved using an “enforcement through education” approach whereby volunteer stewards intercept visitors to provide site interpretation and encourage proper use, avoiding the necessity for regulatory management measures. The proposal provides strong linkages between TSP-3 goals, objectives, management principles and

policies, and providing generally strong rationale for the use of non-regulatory management measures. However, in the absence of regulatory changes to site management protections, the proposal does not actively change the status quo of current management. While limited application of regulatory management mechanisms may not currently be necessary at the site, a designation absent them creates some conflict with management interest the Working Group was striving for with simplified designation categories. The success of non-regulatory management measures will depend upon the leadership and capacity of local volunteers programs which are generally stretched thin, so additional capacity will be critical to success of long-term goals. Site management would benefit from detailing additional expectations and outcomes in the event that progress metrics are not met. Further, while Blacklock Point is unique with respect to its upland natural values, the upland management policies are outside the management intent of the TSP-3.

As a remote site with limited access, goals for education, engagement, and monitoring will be challenged by safety concerns, seasonality, and volunteer capacity, potentially limiting opportunities to meet site goals. Coordination with agencies will be key to program development, but agencies in the region have limited capacity and funding to participate in programs, engage in enforcement, or develop new signage. Implementation of a designation at this site may additionally constrain agencies in a region with low enforcement capacity, and increase hazards associated with access. While the education and monitoring goals and metrics are ambitious, the stewardship program has yet to be established, and may benefit from further development of conservation criteria, expectations, and clear timelines.

The proposer put forth a good effort to engage a variety of stakeholders in proposal development. However, the demographics of the area and the nature of access at the site may prove extremely challenging for ongoing and future stakeholder engagement. The site lacks proper infrastructure to facilitate on-site educational group activities such as parking lots or well-maintained access points, and its remote nature make it a challenging site for engagement. Independent funding sources have not been identified to support the education programs, which would need to be developed within 1-2 years. While education and outreach activities may help improve the site, and a designation will likely lead to increased site recognition, implementation of a new site designation may also serve to increase site use at-odds with site goals. Further, increased visitation without a robust volunteer program in place may lead to increased degradation of the site. If visitation remains low, it is uncertain that education goals would be possible to meet. However, many of the recommended actions do not require a management designation to be implemented, and in the future would benefit from a coordinated coastwide volunteer interpreter program.

The landward site boundary was requested to be the "vegetation line at or near the top of the cliff", rather than the Oregon mean high water shoreline (MHW), which the site polygon is automatically clipped to by the Rocky Habitat Web Mapping Tool. While a landward boundary above MHW may be considered for a rocky habitat site designation, the proposed site abuts Floras Lake State Natural Area along the entirety of its landward boundary. OPRD does not define an SVL for designated State Parks lands, so any consideration for a landward boundary above MHW would need to be sufficiently justified and reconciled with the agency. Further, the inclusion of land above the 16-foot elevation contour on the steep cliffs adjacent the sandy shoreline on the northern boundary of the site may be outside the scope of rocky habitat management, and will need further evaluation with the appropriate agencies. Currently, the MHW boundary appears sufficient to meet the stated site goals when coupled with the protected status of the uplands as a State Natural Area.

The Rocky Habitat Working Group recommends OPAC consider Blacklock Point Marine Conservation Area for potential recommendation to LCDC, with an understanding that this recommendation hinges on appropriately addressing the considerations described above. These considerations include:

- develop clear management expectations, criteria, outcomes, and timelines, to ensure consistency with rocky habitat management and site goals,
- clear expectations set for establishment and support of volunteer programs, including agency roles and enforcement,
- and reconciling site boundaries (with respect to the SVL, inclusion of northern cliffs) with the appropriate agencies.

Where possible, the Working Group supports addressing the considerations and concerns above through statewide and site-specific non-regulatory management plans, where appropriate, with a focus on volunteer monitoring, interpretation, education, and awareness efforts. Additional considerations for potential recommendation include the other merits and perspectives identified above and in the full packet of evaluation materials, in balance with the proposed site goals.