

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: [Chapman 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: [Margaret Treadwell](#)

Affiliated organization(s): [North Coast Rocky Habitat Coalition](#)

Date of proposal submission: [December 31, 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 – Good site for education/outreach. Proposer chose MCA to allow for greater mussel harvest, which is reasonable and fits with anticipated future site use.
Measurable results and outcomes should be reasonably measurable and achievable.		X – BLOY nesting success is reasonable/achievable, but baseline monitoring and criteria may likely need to occur prior to proposed harvest restrictions and human activities rules in order to measure any intended outcomes.	
Site Uses should be characterized appropriately, with reasonable expectations for potential impacts.		X – Characterized appropriately, but some proposed restricted uses are beyond management authorities, TSP3, and as new management strategies, the efficacy and potential impacts are not well understood and will require monitoring. Provision to limit climbing on intertidal rocks may limit ability to harvest mussels. Dog management	

		expectations may be challenging to achieve, more information needed to better understand nature of intertidal use between shoreline and offshore rocks.	
Key Natural Resources , should be characterized appropriately, including features, values, and anticipated impacts.		X – Birds are well characterized here however, there is a lack of information on the significance of the intertidal habitat and ecology (both within literature and proposals). Some of the characterization here may reflect coastwide info from SeaSketch, rather than site-specific	
Regulations & Enforcement should be clearly stated with reasonable expectations.		X – Needs work and revision. Many proposed regulations not enforceable or within state authority, some unreasonable expectations and some rules already exist, or do not require a designation to enforce. No climbing on intertidal rocks is at odds with opportunities for allowing mussel harvest. Discrete area of dog management challenging. Does restricting intertidal rocks present a safety issue for beachgoer at pocket beach? Concerns about razor clam and crab harvest being restricted in sandy beach area.	
Non-Regulatory Management Mechanisms should be clearly stated with reasonable expectations.		X – Some monitoring measures rely heavily on species likely impacted by adverse effects, consideration of more formal techniques and greater	

		<p>monitoring of human activities and site uses. Shared resources/staff w/Haystack programs. City not making financial commitments at this time.</p>	
<p>Stakeholder Engagement should be characterized appropriately, and include clear and actionable outreach.</p>		<p>X – Strong outreach and appropriately characterized, but it was also a little confusing given overlap with feedback for Ecola Pt. w/respect to impacted uses and stakeholder support. Outreach to rec. fishing community may be inadequate.</p>	
<p>Additional Information should provide relevant context.</p>			<p>X – Good, but clarification still needed on how to resolve intertidal climbing restrictions w/on-site education intentions.</p>
<p>Goals, objectives, management principles, and policies within TSP3 should be adequately addressed and/or advanced.</p>		<p>X – Some management principles are outside the scope of current designation but goals, objectives and policies within the TSP were adequately addressed. It is unclear however how some may be advanced – needs further establishment of metrics and monitoring to determine whether advanced.</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 – Reviewers should consider long-term intended goals of designations and especially how certain research practices may not be appropriate if at odds with conservation policies. May be more consistent with rules for Marine Gardens.</p>	
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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.)? *Many similar to Ecola Pt. – preservation of biodiversity, bird and wildlife disturbance, growing uses, loss of some seabirds.*
- b. What are the specific management objectives relating to the concerns above? *Minimize disturbance of wildlife, trampling, support site preservation from increasing human uses, maintain and protect habitat.*
- c. What are the proposed management measures to help reach these objectives? What is the provided rationale for these measures, and is it appropriate? *Restricting certain activities: a) commercial/recreational invertebrate and algae harvest, b) shoreline recreation: leash dogs, no climbing on intertidal rocks, no drones and no kite flying. Additional restrictions proposed on airplanes and boats. Some proposed management measures are already in place (e.g. fireworks).*
- d. In what ways would the proposed site management prescriptions limit adverse impacts to habitat and/or wildlife? *If successfully implemented and enforced, restricting certain uses, limiting disturbances and educating visitors may further limit adverse habitat and wildlife impacts. Interestingly, some management prescription may do more to limit adverse impacts to habitat and wildlife at an adjacent site. While the rationale for the management prescriptions is well provided for in the proposal, many management prescriptions will require monitoring plans to determine whether they will limit adverse impacts, particularly for species with outside stressors.*

2. Regarding the site map(s) provided:
 - a. Is the polygon appropriate for the location (e.g. size, shape, placement, etc.)? Yes – adjacent the northern stretch of more densely populated end of Cannon Beach. It is a likely area of overflow from Haystack Rock and growing use.
 - b. Does it reflect the goals or intentions of the proposal? Yes – as a “gateway” it is ideally placed to serve its intention with respect to limiting impacts on the adjacent site (Ecola Pt).
 - c. What are the strengths and/or weaknesses of this particular shape and placement? Beach boundary and dog management measures may be problematic from enforcement standpoint. Maximizes rocky habitat protections in relatively small area, confined to headland. Provides further protection for offshore rocks.
3. Are the goals and objectives of the proposal clearly stated, and what are their strengths and/or weaknesses? Goals and objectives are clearly stated.
4. Will the proposed criteria to evaluate site goals, objectives, or success, be reasonably measurable or achievable? How effective will they be? This is unclear. Some criteria may very well be impacted adversely by external events such as climate, predator/prey populations, etc. – particularly birds and mammals. Given some of the management principles proposed to meet the sites goals and objectives may not be feasible, it’s not likely that these are *fully* achievable goals. However, there is merit in many of the management prescriptions recommended and some goals and objectives may very well be able to measure some level of success, particularly if goals are narrowed or modified to more closely meet an educational (Marine Garden) designation.
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? Harvest restrictions and restricting human activities would be most influential management measure. See other comments with respect from the Ecola Pt. proposal, which provides for similar measures on human activities at the site. The nature of the education program and the character and training of volunteers will play an integral role in whether this site realizes success. Other management measures may restrict uses beyond current agency authorities so would need deeper discussion. All proposed management measures to realize desired outcomes and change status quo will require state and local investments, monitoring and management plans, timelines for checkpoints and evaluation. This is evident from existing designations that currently are not achieving these same desired outcomes, yet realize the similar management prescriptions. This is thematic issue of increasing human presence and activities disturbing wildlife may require more comprehensive approaches in the RHMS.
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, however the proposal leans heavily on seabird and shorebird metrics for protection, careful consideration of appropriate monitoring plans should be considered given the broad impacts on these species are uncontrollable by designation/management (predator, available prey/diet, oceanographic influences, etc.)

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.) Yes, however, proposal does not acknowledge FAA role in regulation of airplanes/drones, not-implementation ready for those recommended rules thus desired outcomes for those activities should be outlined separately. This may be the case as well for regulating boats with OSMB.
8. Is there any relevant historical or institutional context to this proposed site designation that should be taken into consideration? N/A
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? Maintain, protect habitats and biological communities; management measures allow for use (? – see comment re: mussels and intertidal rule recommended) and protect them from degradation; enhance appreciation, education, interpretation and outreach. Further discussion is needed on access and recreation with respect to proposed rules and management measures, especially over time as site changes occur from natural erosion, sea level rise, etc.
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? Ecola Point (proposed to north) and Haystack Rock (existing to south). This site would support those two as “overflow” and a “gateway” according to proposed goals/desires.
 - b. What are the potential links, considerations, or conflicts between them? See above, potential overflow for Haystack and gateway to more sensitive area to the north – whether or not designated.
 - c. In what ways does this proposed site designation differ from other proposals that overlap or interact with it? Very similar to other sites to the north and the south as proposed.
11. How might this site designation interact or fit in with the broader coastwide regulatory and management context of all habitats, resources, and designations? Covers all rocky habitat categories of Strategy. Proposed area would be more comprehensive in covering habitat area than existing designations given subtidal inclusion.

12. What, if any, practical feasibility concerns might you have about implementing the proposed site designation? Dog rules challenging to implement or enforce. Proposed restriction on humans in intertidal rocky areas would eliminate tidepooling opportunities and mussel harvest which is explicitly provided for. Reliance on citizen groups and local money high, but a clear mechanism for sustainable funding is not identified. Reliance on local community for compliance and monitoring is high – clear timelines and benchmarks should be identified to ensure desired outcomes are being met by management measures.
13. What are the organizational partnerships involved in this proposal? In what ways have those partnerships contributed to development of this proposal? The proposal lists many potential organizational partnerships with Audubon, CoastWatch, The City of Cannon Beach, etc.
14. Are there any additional materials or documents provided? If so, what are they and what is their purpose? Yes, many, including a number of strong letters of support.
15. Are there any additional site considerations that should be noted?

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. Includes some sandy beach which is outside of management authority of TSP3. The polygon does not reflect proposed 500 ft. buffer around the rocks, and does not indicate which rocks would have the 500 ft. buffer.

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. The physical nature of the site is small but covers all habitat categories within the TSP3.
18. In what ways does the proposal appropriately address, reflect, or account for the risks associated with potential future sea level rise scenarios? This is a challenging area to evaluate in proposals, however, consideration is adequately provided for as may be expected. Some considerations that might be important for further evaluation: future access to the site may become completely obsolete pending various impacts of sea level rise and climate change impacting accessible.

Biological

19. How well represented by the proposed polygon sketch are the species and/or habitats of interest that are mentioned in the proposal? The polygon covers the extent of the isolated rocky habitat however species representation here is not as well known or documented in existing data tools for natural resources. Questions about proposer intentions for how the seaward boundary interacts with the proposed 500 ft. regulatory boat buffer.

20. How appropriate is the selected designation category and stated goals for the protection of the species and/or habitats of interest? See comments within the matrix. Given many existing rules are intended to address current concerns, it's important to think carefully through any new management measures, and the criteria for evaluating of those measures, to understand what may be most appropriate for the protection of the species and/or habitats of interest.
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? Tidepooling or the limited fish harvest that occurs at the site could potentially be negatively impacted by the proposed provisions to restrict climbing on rocks.

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? Most *all* human activities (and potentially presence) would be impacted based on the current proposed management prescriptions – in particular the 500 ft. buffer and the disallowance of accessing the rocky intertidal area. Because a number of these proposed management measures are in conflict with many of the allowed activities, intention of the proposer (and associated outreach) will be critical to understand in evaluation. A distinction between guidance and required rule for management should be determined, particularly as it relates to wildlife disturbance recommendations.
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? It is important to note that many of the current human use activities at this site, while not heavily impacting the site now, may be disallowed in the future.
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? See comments above in #22. In particular, many of the human use activities that were mentioned to not be impacted, indeed would be impacted. Without further outreach and engagement from the impacted users, both this and enforcement may present relevant management concerns for the proposed area.

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 your personal recommendation selected at the bottom. If more space is required, please attach additional pages.

Generally speaking, this proposal's goals seem better suited for a Marine Garden, with modifications to proposed management measures to be consistent with such a designation. The proposer, acknowledging existing mussel harvest in the area, proposed an MCA in order to allow flexibility and allowance for greater mussel harvest than a Marine Garden would allow for. The location is well suited to support education and long-term conservation of the rocky habitat to the north. The thoughtful connection between this proposal and Ecola Pt. and the strong stakeholder outreach, are appreciated.



OCMP

Initial Proposal Period

Primary sticking points are related to recommended management measures for human activities - in particular, FAA and OSMB authorities were identified for boat, drones/airplanes similar to Ecola Pt. Creating rule and management for dogs and climbing on intertidal rocks may also present challenges and alternative disturbance/harassment management may be more appropriate from a management context. These wildlife disturbance concerns are difficult to address but not unsurmountable, and OPAC should consider these “thematic”, repeated in both public scoping and in desired outcomes from proposed areas for designation.