

# Rocky Habitat Site Proposal Final 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](http://seasket.ch/y0uvvr4X_7)

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



## Final Recommendation

This document summarizes the site proposal evaluations conducted by the Rocky Habitat Working Group. The summary below represents an evaluation and recommendation synopsis for Blacklock Point Marine Conservation Area. During evaluations, the agencies and Working Group identified considerations for potential recommendation by the Ocean Policy Advisory Council (OPAC). Consideration are those aspects of a proposal, identified through the evaluation process, which the Working Group believes should be addressed to facilitate implementation of the designation as proposed. These considerations were outlined in draft initial recommendation summaries, which were made available for a 30-day public comment period. Proposers were invited to submit written responses to the initial recommendations, and present their proposals and responses in the April 29, 2021 Working Group meeting. Following discussion with proposal presenters, the Working Group deliberated and crafted their final recommendations.

**Final Recommendation: *Not Recommended, Continuing Consultation (8:4)***

## 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 Rocky Habitat Management Strategy 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 regulatory 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, so securing additional capacity will be critical to success of long-term goals. Further, while Blacklock Point is unique with respect to its upland natural values, the upland management policies are outside the management intent of the Rocky Habitat Management Strategy.

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, in coordination with agencies.

The proposer put forth a good effort to engage a variety of stakeholders in proposal development. However, the nature of access at the site may prove challenging for ongoing and future stakeholder engagement. The site lacks adequate infrastructure such as parking lots or well-maintained access points, and its remote nature makes it a challenging site to facilitate on-site 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. 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.

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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.