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April 24, 2020

Walter Chuck, Chair  
Oregon Ocean Policy Advisory Council  
C/O Andy Lanier, Marine Affairs Coordinator  
Oregon Department of Land Conservation and Development  
635 Capitol St. NE, Suite 150  
Salem, OR 97301-2540

**Re: Draft Rocky Habitat Management Strategy Phase II**

Dear Chair Chuck and Members of the Ocean Policy Advisory Council (OPAC),

Thank you for the Council's continued work at this unprecedented time. The Pew Charitable Trusts is submitting supplemental public comment on the Oregon's Rocky Habitat Management Strategy (Strategy), which is before OPAC at its May 6, 2020 meeting. In light of the current global pandemic and its effects on the State of Oregon, in hand with the current designation proposal framework in the Strategy, we send the following recommendations for your consideration.

1. Please approve the Strategy and extend the initial designation submission window to 6 months from the issuance of an executive order from Governor Brown lifting the existing prohibition of non-essential social and recreational gatherings (see Executive Order 20-12)<sup>1</sup>.
2. We encourage state agencies that contributed to the 1994 rocky habitat area designations to review their recommendations and submit new designation proposals in partnership with local groups. Oregon's Department of Land Conservation and Development (DLCD), the Oregon Department of Fish and Wildlife (ODFW), and the Oregon Parks and Recreation Department (OPRD), can take a close look at the state's existing intertidal resource inventory during the upcoming public proposal period and help give guidance, provide expertise to local groups and the general public, lend their support, and help organize methodologically sound resource inventory efforts. The 1994 recommendations were already approved by OPAC and the Land Conservation and Development

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<sup>1</sup> Governor Kate Brown, Oregon - Executive Order NO. 20-12. Stay Home, Save Lives, March 24, 2020. URL: [https://www.oregon.gov/gov/Documents/executive\\_orders/eo\\_20-12.pdf](https://www.oregon.gov/gov/Documents/executive_orders/eo_20-12.pdf)

Commission<sup>2</sup>. Continuing this work in partnership with local groups would honor the state resources and staff time that informed the initial recommendations. In partnership, agencies can analyze and provide expertise for the following:

- a. Six 'habitat refuges' recommended in 1994 that mirror the new Marine Conservation Area category: Tillamook Head, Cape Lookout (south side), Coquille Point, Crook Point/Mack Reef, Hooskanaden Creek, and Cape Ferrelo, Cascade Head.
- b. Two 'research reserves' Marine Research Areas: Cape Blanco and Humbug Mountain to Lookout Rock.

Oregonians and Oregon's state agencies have long recognized and sought to protect the ecological, economic and social value of rocky habitats. OPAC and its working group have provided the time and leadership to build upon this legacy. Please approve the Strategy, extend the designation window, and encourage the state agencies to partner with local groups to forward proposals, especially for areas already included in the current Strategy, named above.

Thank you for your time and consideration. We appreciate the opportunity to work with you to maintain healthy coastal and ocean ecosystems.

Sincerely,



Elizabeth Ruther  
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Conserving Marine Life in the U.S.  
The Pew Charitable Trusts  
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<sup>2</sup> Oregon's Territorial Sea Plan, Part III-G: Site Designations. URL: <https://www.oregonocean.info/index.php/ocean-documents/planning/territorial-sea-plan2/part-3-rocky-habitat-management-strategy-1994-2019/1554-otsp-part-iii-g-site-designations>