

Ocean Policy Advisory Council  
c/o Andy Lanier  
Marine Affairs Coordinator  
Department of Land Conservation and Development  
635 Capitol St. NE, Suite 150  
Salem, OR 97301-2540

April 28, 2019

Final comments re: the Draft Rocky Habitat Management Strategy

To the Ocean Policy Advisory Council:

The Oregon Shores Conservation Coalition has commented on the evolving Rocky Habitat Management Strategy on numerous occasions as the drafting process has wended its way toward the current stage. With a couple of exceptions, at the end of these comments, we will not reiterate all the points we have made before, but simply incorporate them by reference.

We wish to make two additional points as the draft reaches its final consideration and, presumably, adoption.

First, the world has changed for all of us since the last round of comments. The period for public involvement in the site designation process must now be extended. While interested citizens may be able to do some things individually at present to begin informing themselves about participation in the process, this is to be a community process, with the engagement of multiple stakeholders encouraged. The public portion of the process can't begin until gatherings and field trips are possible. It would be bad faith with the process of development of this strategy to call the period in which the shelter-at-home order is in effect part of the site designation timeframe. Even if the order is lifted, it will probably be in stages, and it will take time for community organizing efforts to gear up again. We felt that the timeframe was too tight as it was. We urge that the process be extended until the end of 2020, or six months after travel, gathering, and shoreline access restrictions have been completely rescinded, whichever comes later.

Second, while the development of a new, updated management strategy for our rocky shore and offshore habitat areas was much needed, and we commend the overall thrust of the new plan, we believe that there is one unnecessary gap: Failure to connect this strategy with the good work that was done in the original, 1994 management plan. Specifically, there are key eight areas that were identified in that plan, but where protection was never implemented: Tillamook Head, Cape Lookout (south side), Coquille Point, Crook Point/Mack Reef, Hooskanaden Creek, and Cape Ferrelo (Marine Conservation Areas), and Cape Blanco and Humbug Mountain to Lookout Rock (Marine Research Areas). Much good work was done earlier to identify these areas. There is no reason to wait for the public site designation process to begin formally protecting these areas. Certainly, the knowledge concerning these areas that underlies their designation

can be revisited and updated, and it may be that new, more exact maps need to be drawn, but this should be done expeditiously, and the sites incorporated into the plan.

This should not in any way replace the public process for the remainder of the coast; it should be a precursor. Our general point would be that the 1994 plan should be considered a floor, not a ceiling.

One point we made earlier in the process that we will reiterate now is that accompanying this strategy, and the site designations for specific levels of protection, should be tightened harvest regulations adopted and enforced by the Oregon Department of Fish and Wildlife for the entire coastline. Specifically, we have urged that harvest of piddocks be eliminated completely.

Finally, futile though it may be, we will repeat one more time that it was an error to retitle this process the Rocky Habitat Management Strategy. “Habitat” is an abstract, ecology-nerd word. We at Oregon Shores use it all the time, as do fellow conservation groups, scientists, and resource agency personnel. We do not believe, however, that it has any resonance with the public—the word makes the process sound dense and bureaucratic and thus uninviting. Worse, the term is so meaninglessly broad as to be inaccurate. There is rocky habitat anywhere that rock substrate provides habitat to plants and animals. There is rocky habitat at the crest of the Cascades, in the depths of the Columbia Gorge, and in the Alvord Desert. The process under discussion is about rocky marine areas. The term “rocky shores” does have public resonance. Yes, we understand that the decision to change the name was due to the fact that the new strategy also refers to subtidal and emergent offshore rock areas. To be truly accurate, then, the name should include all these areas. However, no one is confused by the term “rocky shores”—it is sufficient to indicate what it involved. “Rocky habitat” says nothing. We urge that the process be returned to its original title as the Rocky Shores Management Strategy.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip Johnson", with a long horizontal line extending to the right.

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