



**OREGON
WILD**

Protecting Oregon's wildlands, wildlife, and waters since 1974.

www.oregonwild.org

February 28, 2020

Department of Land Conservation and Development
635 Capitol St NE #150
Salem, OR 97301
TSP.Comments@state.or.us

Re: Comment from Oregon Wild about the Rocky Habitat Management Strategy

To whom it may concern:

On behalf of Oregon Wild -a state-based conservation organization dedicated to protecting Oregon's wildlands, wildlife, and waters as an enduring legacy for all Oregonians- and our nearly 20,000 members and supporters, we would like to thank the Department of Land Conservation and Development for allowing the public to provide input on the Rocky Habitat Management Strategy (Strategy).

As habitat degradation continues to wreak havoc and extreme loss of biodiversity in our oceans and lands intensifies, it's critical we have comprehensive, strategic plans in place to help ensure ecosystems can not only survive, but thrive. Like any solid management plan, the Rocky Habitat Management Strategy should include clear, meaningful and formalized goals, identify key measures for achieving the necessary protections, and ensure there are mechanisms in place for transparency and accountability. In particular, we encourage DLCD to formalize and include protective designations for rocky habitat areas that were identified for protection or special management in 1994, but were never implemented. Finally, to ensure we aren't just looking at this Strategy in a silo, it's also important that it more clearly connects to other existing relevant marine-based plans, such as the Oregon Ocean Acidification and Hypoxia Action Plan.

The rocky shoreline of Oregon provides essential habitat and vegetation for a number of marine species. Protection of this nearshore environment is also vital as several organizations and government entities, including Oregon Wild, explore the possibility of sea otter reintroduction in the near term. Once highly prevalent in Oregon, sea otters were extirpated from our seascape by 1911 due to overhunting. As a keystone species – a species that other species largely depend on and which maintains ecosystem function – the return of the sea otter could have a significant impact on the nearshore environment, especially when it comes to enabling bull kelp to grow; thus providing food and shelter for a number of aquatic species.

Earlier this year, a study was published by an Oregon State University master's student that explores the potential habitat (based on historical records, availability of prey, and human activities) for sea otters. His results verify that the best, suitable habitat for sea otters is the nearshore, rocky subtidal, sandy embayments, and estuaries. Updating the Strategy now is important for ensuring necessary measures are in place for rocky habitat and other submerged aquatic vegetation, which sea otters rely on. Just like most things in nature, there is a reciprocal and symbiotic relationship between sea otters and the nearshore environment: their presence can aid in the recovery and resilience of the seascape, but it also depends on it for their survival. As such, we ask that you adopt policies that require avoidance of impacts to submerged aquatic vegetation with clear, precise language to advance state agency missions and policies within the coastal zone.

Thank you for allowing us to submit public comment.

Danielle Moser
Wildlife Program Coordinator
Oregon Wild