



Friends of Cape Falcon Marine Reserve
c/o Lower Nehalem Community Trust
PO Box 496, Manzanita, OR 97130
Phone: (503) 298-5190
Email: CapeFalconMR@gmail.com
Web: www.NehalemTrust.org/CapeFalconMR

Walter Chuck, Chair
Oregon 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

February 28, 2020

RE: Comments on the Draft Rocky Habitat Management Strategy Phase II

Dear Chair Chuck and members of the Council,

The Friends of Cape Falcon Marine Reserve was founded in 2014 to increase understanding and appreciation of the Cape Falcon Marine Reserve, located between Cannon Beach and Manzanita. We see the marine reserve site as a key ocean component of an interconnected network of ecosystems encompassing the nearshore ocean, the shore and coastal headlands of Oswald West State Park, the mountain peaks above it, and neighboring coastal and terrestrial ecosystems. The rocky habitats of the intertidal and subtidal are key components of that network, and their protection and conservation is essential to the health of these ecosystems and the services they provide.

We congratulate OPAC and the Rocky Habitat Working Group on the release of the draft Rocky Habitat Management Strategy for public comment. We recognize and appreciate the time and energy that has gone into getting to this milestone, and appreciate the high quality of the result.

We are, however, concerned that the Rocky Habitat Management Strategy update does not update the State's rocky habitat inventory from the 1994 Rocky Shores Management Plan. There are many rocky habitats with important bird colonies and abundant intertidal life that are not listed, mapped and/or well described in the new document or its Appendices, for example the rocky habitats at Arch Cape, Arcadia Beach, and Hug Point. We think the document and the process would be stronger if the State were to provide a complete inventory of Oregon's rocky habitats for the public to consider for site designations, outside of the Web Mapping Tool.

Additionally, we were alarmed to see that recommended site designations from 1994 that were not implemented are not carrying over to the new Rocky Habitat Management Strategy. Examples on the North Coast include Tillamook Head, which was recommended to become a Habitat Refuge, and Ecola Point/Sea Lion Rock, categorized as Not Yet Designated/Priority Rock. These areas are set to have no designations in this new plan. Yet they are home to important bird colonies, marine mammal haul-out sites, and intertidal habitats, and are deserving of designations. At Tillamook Head, impact concerns cited in 1994 were "boat and low flying aircraft disturbance to birds and mammals." These impacts are not likely to have lessened in the intervening 25+ years, given the increase in population and the advent and popularity of drones. Even more concerning, at Ecola Point/Sea Lion Rock, the 1994 plan noted "high visitor usage (540,800 day visitors, 1991-92)" and impact concerns of "trampling from people

exploring the intertidal zone, climbing (illegally) on National Wildlife Refuge rocks, and noise from low flying aircraft.” It is doubtful that the impacts at this site have lessened in the meantime, either. We recommend that these site designations be automatically included in the new Rocky Habitat Management Strategy. If updates need to be made, they should be “changes” not “new” recommended designations.

Regarding the Rocky Habitat Web Mapping Tool, we appreciate the technological sophistication of the tool, the opportunity to explore Oregon’s coast, wildlife, and resources using GIS, and the inclusion of biological data, some dating back as far as the 1970s. However, we are concerned that some sites do not have recent biological data. For example, the most recent seabird survey results at Arch Cape, Hug Point, Arcadia Beach, Jockey Cap rock, Silver Point rock, Haystack Rock (except black oystercatchers), and Tillamook Head are from 2008, twelve years ago. We recommend that every effort be made to include additional data sets to provide a more comprehensive view of wildlife habitat usage over time, including during the past decade.

Lastly, we are concerned that community members may be daunted by the Web Mapping Tool and the requirement to use it for submitting site designation proposals. This will be an issue for those community members who are not familiar with GIS, those not well-versed in environmental policy and law, and most especially for those who are not comfortable with computers and those who have limited computer and/or internet access. Most of all, the research required to answer the many questions on the site designation proposal form will deter all but the most motivated community members. While we believe that it is important to craft well thought-out and well-supported site designation proposals, we recognize that the number of people who will jump through these hoops will be quite small. This is all the more reason to include unimplemented designations from the 1994 plan and to publish a new rocky habitat inventory outside of the Web Mapping Tool (as described earlier in this letter). We also recommend looking for ways to simplify the process to make it more inclusive.

Thank you for considering our comments.

Sincerely,



Nadia Gardner
Chair



Margaret Minnick
Coordinator