



Oregon

Tina Kotek, Governor

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Oregon Coastal Management Program
Oregon Department of Land Conservation and Development
ATTN: Andy Lanier, Marine Affairs Coordinator
635 Capitol Street NE, Suite 150
Salem, OR 97301-2540
Email: tsp.comments@dlcd.oregon.gov



RE: Comments on Rocky Habitat Management Plan Drafts

Dear Rocky Habitat Management Team,

Thank you for the opportunity to comment on the draft Rocky Habitat Site Management plans. We appreciate the effort to develop site-specific management frameworks for rocky habitats along the Oregon coast and have listed comments below.

Global comments that apply to all draft management plans

- In the first chapter “summary” (page 8): “Once approved, state agencies like Oregon Parks and Recreation Department (OPRD), Oregon Department of Fish and Wildlife (ODFW), and the Oregon Department of State Lands (DSL) must adopt new rules through a formal rulemaking process.”
 - We are unclear why ODFW is included in this statement. These rulemaking processes are complete for ODFW and we are not planning for any additional rulemaking related to these plans at this time.
- Site Monitoring, page 28: “Opportunities to integrate the monitoring recommendations in the kelp status report with ongoing long-term monitoring by the ODFW Marine Reserve Program should be explored.”
 - We suggest deleting this sentence. We suggest state monitoring priorities and workflow be guided by the state and through its chain of command. In addition, the kelp status report from the Oregon Kelp Alliance relies upon the ODFW Marine Habitat team’s long-term monitoring. Lastly, ODFW Marine Reserves team is guided by an Oregon Ocean Policy Advisory Council developed Scientific and Technological Advisory Committee, and ODFW does not have the authority to develop new broad goals without their consultation.

Site-specific comments

Cape Lookout

- Page 8: “What began as volcanic lava flow, has become valuable habitat, alive with nesting seabird colonies, fish, a multitude of intertidal and subtidal invertebrates, kelp forests, seals, sea lions, and migrating gray whales.”
 - We suggest striking “gray”, since many species of whales migrate along the area.
- Page 45: “Invertebrates: Shellfish and other invertebrates may be harvested within subtidal areas according to coastwide regulations. Within intertidal portions of the MCA, commercial harvest of invertebrates is closed with the exception of purple sea urchins.”
 - We suggest deleting “with the exception of purple sea urchins.” The intertidal portions of the MCA are not open for commercial or recreational harvest of purple sea urchins.
- Page 45: “Harvest of sea urchins (commercial or as part of habitat restoration) will be promoted when monitoring indicates urchin populations are at levels likely to lead to overgrazing of kelp beds.”
 - We suggest deleting this entire sentence. ODFW has no plans to allow or promote this activity at this site.

Ecola Point

- Page 9: “Ecola Point used by residents and visitors for beach walking, running, dog walking, tidepool exploration, photography, bird watching, fishing, kayaking, and bicycling.”
 - There is a small typo, and insertion of “is” between “Point used” is needed.

Thank you for your consideration of these comments. Please let us know if you have any questions or would like to discuss any of them further.

Sincerely,



Eric S. Anderson
Shellfish Project Leader
Marine Resources Program
Oregon Department of Fish and Wildlife

Cc: Kendall Smith – Pink Shrimp and South Coast Shellfish Project Leader
Kelly Corbett – Shellfish Program Leader
Scott Groth – Resource Assessment and Management Section Manager