



Oregon

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

RE: Comments on Rocky Habitat Site 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. Based on decades of aerial pinniped survey experience, we offer the following general and site-specific comments related to pinniped use and monitoring at these sites.

General comment applicable to all plans

We recommend adding the following language to the *Site Monitoring* section of each plan, following the reference to U.S. Fish and Wildlife Service seabird nesting surveys. Including this information would help ensure that existing long-term pinniped monitoring conducted by ODFW is noted alongside other ongoing biological monitoring programs.

OREGON DEPARTMENT OF FISH AND WILDLIFE PINNIPED SURVEYS

Rocky habitats along the Oregon coast provide critical resting and breeding areas for pinnipeds. The Oregon Department of Fish and Wildlife's Marine Mammal Program conducts periodic aerial surveys of these habitats to monitor pinniped distribution and abundance in support of coastal conservation, management, and coastal development activities. Survey results are publicly available through an online dashboard:

<https://www.arcgis.com/apps/dashboards/530f6596548941aeb1cbb24b7bd3e6ab>

Site-specific comments

The following site-specific comments describe pinniped haulout use, or the absence of documented use, at each of the seven rocky habitat sites, based on long-term survey observations, and are provided to support accurate site characterization within the management plans.

Ecola Point

On page 8, under *Site Information*, the plan states that “this area is also a crucial haul-out site for seals and sea lions.” While this characterization may have been accurate in the 1980s, we have not observed much, if any, use of Ecola Point by seals or sea lions in recent decades. The reasons for this apparent abandonment are unclear, but animals may have shifted to nearby sites such as Tillamook Head (harbor seals) and Tillamook Rock Lighthouse (sea lions), where they are regularly observed during breeding-season surveys.

It is possible that pinnipeds still use Ecola Point occasionally and that such use has gone undetected; however, it seems unlikely that the site supports pinniped numbers comparable to those historically documented. We would be very interested in learning of any recent observations that document pinniped use of this site.

Chapman Point

We are not aware of any current or historical pinniped haulouts within the boundaries of the new Chapman Point Marine Garden. However, we would be interested to learn from future site monitoring if pinnipeds are observed using this area.

Cape Lookout

On page 39, the plan states that “a wave-cut bench at the western tip of Cape Lookout serves as a haul-out site for pinnipeds, including sea lions.” While this may be true on occasion, we have not personally observed pinniped use of the tip of Cape Lookout during our decades of aerial surveys. Instead, we consistently observe use by small numbers of harbor seals (<50) at two haulout sites on the north side of the Cape. These haulouts occur along a ledge approximately one-third of the way down from the tip and on the sandy beach within the eroded cove just inside the new Marine Conservation Area.

Fogarty Creek

We have no specific comments on the new Fogarty Creek Marine Conservation Area other than to note that the boundaries include rocks that are regularly used by a local population of approximately 50–100 harbor seals. These animals also haul out in the adjacent Boiler Bay Marine Research Area.

Cape Foulweather

While harbor seals regularly haul out at the adjacent Whale Cove Marine Conservation Area and Otter Rock Marine Garden, we are not aware of any current or historical pinniped haulouts within the boundaries of the new Cape Foulweather Marine Conservation Area.

Blacklock Point

On page 29, *Image 5* is mislabeled as harbor seals whereas the animals hauled out are Steller sea lions. This rock, located just southwest of Tower Rock, is an intermittently used haulout site for both Steller sea lions and California sea lions. The adjacent rocky intertidal shoreline is regularly used by a small population of harbor seals (<50). This shoreline site could be susceptible to disturbance if visitation to the area increases.

Cape Blanco

We have no specific comments on the new Cape Blanco Marine Research Area other than to note that the boundaries include intertidal rocky shore habitat that is regularly used by a local population of approximately 100–200 harbor seals.

Thank you for considering these comments. We hope this information is useful as the site management plans are finalized, and we appreciate the opportunity to contribute to this process.

Sincerely,

Bryan Wright
Biometrician
Marine Mammal Program