

January 30, 2026

Department of Land Conservation and Development
Attn: Andy Lanier, OCMP-DLCD
635 Capitol St. NE
Suite 150
Salem, OR 97301-2540



**SEVEN CAPES
BIRD ALLIANCE**
Working Together for Birds and Nature

Re: Comments on draft management plans for rocky habitat designations

Dear Mr. Lanier:

Seven Capes Bird Alliance (Seven Capes) submits comments in response to the Feedback Opportunity (January 12, 2026): Rocky Habitat Site Management Plan Drafts. This letter provides general comments applicable to all of the listed site management plans. Specific comments on the management plans for Cape Lookout, Fogarty Creek, and Cape Foulweather Complex MCA management plans are also part of this transmittal.

Seven Capes commends the Department of Land Conservation and Development (DLCD) for its collaborative approach to the development of site management plans for the eight recently designated rocky habitat sites. The DLCD collaborated with community groups as well as invited the public to engage in the process through a series of workshops. This collaborative approach better ensures ongoing community involvement in the implementation of site management plans.

The Plans emphasize community engagement through education and stewardship. Community engagement is a crucial component of ecosystem-based management and a key element of the Rocky Habitat Management Strategy. The Plans provide a shared understanding of management objectives and recommended actions to achieve the site goals.

An informal coalition of community organizations and state agencies called the Rocky Habitat Partners Group formed to collectively define strategies and share information related to the development and implementation of site management plans. The rocky habitat coordinator at DLCD provided leadership for this group.

Seven Capes provided DLCD with draft management plans for Cape Lookout and Cape Foulweather MCAs that were developed in collaboration with the Rocky Habitat Partners Group. While the December 2025 draft management plans published by DLCD differ in document organization, much of the narrative from the draft plans we submitted has been incorporated into this latest version.

Seven Capes originally proposed the MCAs at Cape Lookout and Cape Foulweather. We continue to actively pursue the implementation of education, stewardship, and community science programs at these two sites. We are also active in programming for the Fogarty Creek MCA. We are providing detailed comments on the draft management plans for these three sites as attachments to this letter.

The draft management plans for all the sites include a robust list of recommended actions. The total of these actions far exceeds the existing capacity of community groups and state agencies to implement fully. The management plans should explicitly state that these are suggested actions. The community groups are not responsible for implementing all of these actions. The evaluation of the success and effectiveness in meeting site objectives is not dependent on implementing all the actions.

The management plans acknowledge the value and importance of Tribal involvement. Seven Capes welcomes Tribal involvement and seeks to honor the Tribes' deep connection to rocky habitat. Traditional Ecological Knowledge is integral to the management of these sites.

Thank you for this opportunity to comment on the draft plans. Please do not hesitate to reach out if you have any questions related to our comments or would like to discuss them further.

Sincerely,
Kent Doughty



Seven Capes Coastal Conservation Coordinator

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Attachments:

1. Comments on Cape Lookout MCA Management Plan
2. Comments on Fogarty Creek MCA Management Plan
3. Comments on Cape Foulweather Complex MCA Management Plan

Attachment 1
Cape Lookout MCA Management Plan
Specific Comments on December 2025 Draft

Seven Capes Bird Alliance submits the following detailed comments on the Cape Lookout MCA Management Plan: Feedback Opportunity (January 12, 2026): Rocky Habitat Site Management Plan Drafts

P 5. The list of community participants and workshop participants is not accurate. The list provided is from Cape Foulweather, not Cape Lookout.

P 10. Be consistent on use of length dimensions (use feet, not yards).

P 11, last paragraph. Change “will foster” to “fosters.”

P 12 resource sub-objective 1.2 and 1.3. How does 1.3 differ from 1.2? Suggest 1.2 be inclusive of research and monitoring, not just monitoring.

P 13 Objective 2. Add sub-objective: Support targeted research, monitoring, and community science initiatives to inform adaptive, science-based conservation practices.

P 13. Add sub-objective 3.4: Maintain the wilderness character of the MCA and adjacent beach along the southern shoulder. (This recommendation came out of the workshops.)

P 14. Add sub-objective 4.5: Schedule on-site educational and other programs so as not to exacerbate limited vehicle parking at the Cape Lookout parking area off Cape Lookout Road.

P 14 sub-objective 5.5. Add text: Cape Lookout “Marine Conservation Area.”

P 15 Recommended Implementation Action. This list seems redundant with Appendix H. No explanation of why some actions have an asterisk.

P 15 Recommended Action 1. Be consistent on capitalization of “Tribes.”

P 15 recommendation 10. Add: “provided the data is not confidential or otherwise protected.” Research data could contain culturally sensitive information.

P 15 recommendation 11. Add “Tribes.”

P 16 Recommendation 17. Check with OPRD, as updates to the Comprehensive Plan may be infrequent.

P16 Recommendation 19. May be overly ambitious; suggest deleting.

P 16 Recommendation 20. Add “Tribes.”

P 17 Recommendation 26. The tidepools on the north side of the Cape are inaccessible from the Day Use area.

P 17 Recommendation 35. Is this realistic? Has this recommendation been vetted with the County and other enforcement agencies?

P 18. Add recommendation: “Promote awareness among volunteers and the public that Tribal members have rights to access and harvest first foods.”

P 18. Add: “Further” restricting fishing or invertebrate harvest, now or in the future, is neither the intent nor an objective for this MCA.

P 19. The headings need formatting. It now appears that “Conservation and Outreach” is a sub-section of “Natural Resource Conservation.”

P 21. Table row State of the Cape Symposium. Add: “The symposium may be expanded to be inclusive of other rocky habitat designated sites.”

P 30. Revise paragraph:

According to the Oregon **State Wildlife Action Plan (SWAP) Conservation Strategy**, investments in conservation should be strategic, effective, and accountable. The success of these investments can be measured by (1) assessing existing conditions, (2) identifying desired conditions, and (3) measuring change over time. Nearshore resources are still poorly understood relative to the state’s other natural resources. Monitoring provides information that provides a scientific foundation for adaptive management. Despite many ongoing programs, nearshore resources are still poorly understood relative to the state’s other natural resources (~~Nearshore Strategy, 2016~~). While monitoring to better understand trends in ecosystem health and biodiversity of rocky habitats is desirable, funding availability to expand state-implemented nearshore monitoring programs to be inclusive of Cape Lookout MCA is at best uncertain. There are, however, many successful community science-led intertidal monitoring programs to consider as models when evaluating the potential for biological monitoring at Cape Lookout.

Chapter 4. Has this chapter been vetted with the Tribes?

Appendix C: This appendix appears to be missing.

Appendix F: See comments on recommended action list.

References: List in alphabetical order and maintain consistent styling.

The Plan would benefit by including some captioned images to make it more appealing to the public. See the Plan for Cape Foulweather as an example.

Attachment 2
Fogarty Creek MCA Management Plan
Specific Comments on December 2025 Draft

Seven Capes Bird Alliance submits the following detailed comments on the Fogarty Creek MCA Management Plan: Feedback Opportunity (January 12, 2026): Rocky Habitat Site Management Plan Drafts

P 10, first paragraph. Change “will foster” to “fosters.”

P 12 Action 1.1. Rather than naming specific Tribes, consider modifying text to read “Coordinate with Tribal Nations and local, state, and federal resource management agencies on the preserving and monitoring of rocky habitat resources and site stewardship.” The management plans for all of the recently designated sites have similar but notably different text for Objective 1. This raises a question as to why the text differs.

P 15 recommendation 11. Add “provided the data is not confidential or otherwise protected.” Research data could contain culturally sensitive information.

P 16 Action 36. Identifying specific partners may not be necessary.

P 16 Action 41. Change text from tidepool ambassadors to “volunteers.”

P 16 Action 42. Training is referred to as “rocky shores” training, as some volunteers are not working on tidepools.

P 17. It is confusing why information sharing is a subsection of Public Access. This text is more appropriate for the section on education.

P 21. Note line spacing problem.

P 34 Chapter 4. Has this chapter been vetted with the Tribes?

P 38. Throughout the document there is reference to the Department of State Land. The document should state the Department of State Lands.

Appendix H: See comments on recommended action list.

Attachment 3
Cape Foulweather Complex MCA Management Plan
Specific Comments on December 2025 Draft

Seven Capes Bird Alliance submits the following detailed comments on the Cape Foulweather Complex MCA Management Plan: Feedback Opportunity (January 12, 2026): Rocky Habitat Site Management Plan Drafts

P 8 last paragraph. The BLM owns and manages land nearby the MCA. A key access point is across BLM land.

P 12 first paragraph. Change “will foster” to “fosters.”

P 13 resource sub-objective 1.2 and 1.3. How does 1.3 differ from 1.2? Suggest 1.2 be inclusive of research and monitoring, not just monitoring.

P 13. Strike sub-objective 2.3. This objective may not be consistent with the use of the site as a comparison area, nor consistent with ORKA restoration objectives.

P 14 sub-objective 4.4. Delete “tidepool etiquette,” as it is not relevant to Cape Foulweather where the intertidal area is inaccessible.

P 15. Recommended Implementation Action. This IList seems redundant with Appendix F. No explanation of why some actions have an asterisk.

P 15. Be consistent on capitalization of “Tribe(s).”

P 15 Recommendation 2. Add: “that are consistent with use of the site as a comparison area for the Marine Reserve Program.”

P 15 Recommendation 8. Add “provided the data is not confidential or otherwise protected.” Research data could contain culturally sensitive information.

P 16. Suggest deleting Recommendation 16. The intent is not to promote increased visitation, but to improve the quality of experience for visitors already on site.

P16 Action 28. Delete “tidepool ambassador” so that it reads “Train volunteers.”

P17 Action 32. There are no posted regulations about climbing restrictions. OPRD was very clear during workshops that they did not want to endanger park rangers by having them enforce new regulations in hazardous environments.

P17 Action 39. Fix typo in “methods.”

P17 Action 40. It seems unusual for the State to promote one specific private vendor. Suggest a change to partner with experiential learning programs and businesses that “promote responsible use of rocky habitat.”

P 18. Delete: “Communications will initially focus on community perceptions and interests during the planning phase. DLCD will host two community workshops to discuss management issues including information sharing, interpretation, site-monitoring, and enforcement.

The focus will shift to building a volunteer base during initial plan implementation. During implementation, communications and outreach will focus on programs, events, and seasonal updates.” The referenced workshops have already occurred.

P 19-20. Edit text for State of the Cape Symposium. ~~Results of monitoring and research Cape Foulweather Complex MCA and nearby marine designations will be presented at these symposiums, and the first symposium for the Cape Foulweather MCA will be in 2026.~~ Add: “The symposium may be expanded to be inclusive of other rocky habitat designated sites.”

P 20. Add line space between table and text.

P 20. Add “Confederated Tribes of Grand Ronde.”

P 22. The narrative on signage is more applicable to the section on Education and Interpretation. Delete sentence: ~~An interpretive signage plan will be developed in the first two years of MCA implementation (2025-2026).~~

P 23 paragraph on marine education curriculum. Add “Development of a rocky habitat curriculum may be pursued at a statewide level with involvement by the Rocky Habitat Partners group.”

P 25. Delete: ~~Interpretive events will initially focus on birds and their relationship to rocky habitats, as this is a core strength for Seven Capes.~~

P 26. Delete: ~~Practice good [tidepool etiquette](#).~~ The paragraph above notes that tidepools are inaccessible.

P 27. The section on equitable access is very much appreciated but it seems out of place. It might read more smoothly if the interpretive signage narrative was moved to proceed the equitable access narrative.

P 27. Delete: ~~Seven Capes Bird Alliance, OPRD and USFWS will strive to provide translated versions of English-only signs on their websites. While we are not opposed to bilingual information, this document is community based, not just Seven Capes.~~

P 28. There is extra line space at the top of the page.

P 30. Delete redundant information about CoastWatch.

P 32. Add line space after bullets.

P 33-34. Why is a table on interpretive websites in the section on compliance and enforcement?

P 34. Note line spacing problem,

P 34 Chapter 4. Has this chapter been vetted with the Tribes?

P 41. Note line spacing around heading.

P 44. This section seems out of place; consider including earlier in the document

Appendix C. This section is missing

Appendix F. See comments on recommended action list.

References. List in alphabetical order and maintain consistent styling.

