



July 20, 2015

Gregory K. Krutzikowsky
Nearshore Policy Project Leader
Oregon Department of Fish & Wildlife
Marine Resources Program
2040 SE Marine Science Drive
Newport, OR 97365

Dear Mr. Krutzikowsky:

The Oregon Shores Conservation Coalition (Oregon Shores) appreciates the opportunity to provide comments on the 2015 Draft Oregon Nearshore Strategy. These comments are intended to help the Oregon Department of Fish and Wildlife and all Oregonians achieve sustainable use and enjoyment of our nearshore ocean and coastal resources.

Oregon Shores is a non-profit organization founded in 1971 to protect the public's interest in Oregon's beaches and the entire coastal region. For over 40 years, Oregon Shores has advocated for and taken legal action to protect a wide range of public coastal resources and values in estuaries, rivers, and the nearshore ocean. Oregon Shores recently adopted a comprehensive Coastal Conservation Planning Framework that seeks to address the entire coastal region's conservation needs through an integrative, multi-issue, collaborative approach that advances the concept of the "land-sea connection." Oregon Shores sees many of the same concepts in the 2015 Draft Strategy. We thus offer these comments in an effort to relate the ODFW strategy to the goals, objectives, and actions in our own strategic plan.

Strategic Goals, Objectives, and Actions

Oregon Shores finds the 2015 draft to be a useful summary of marine and coastal resources of concern, and of ODFW's current responsibilities and potential interests. Unfortunately, it seems to be simply an update of the 2006 – 2015 plan rather than a fully developed new strategy. The document is missing a number of elements that would make it relevant and useful in addressing oncoming resource conservation challenges on the Oregon coast. ODFW should clearly identify priority issues, which do not appear in the draft, and articulate strategic goals, objectives and specific program activities that would address those priority issues during the plan period. As part of the overall framework for these strategic goals and objectives, we urge ODFW to acknowledge the State of Oregon's overall goals for marine resources in Statewide Planning Goal 19, Ocean Resources, and in the Oregon Territorial Sea Plan. We strongly suggest that ODFW develop these strategic goals, objectives, and actions to serve to guide and evaluate the program actions of ODFW and other entities over the next decade with respect to nearshore issues. Oregon Shores believes that these goals should address the following priority topics:



Climate Change

The draft lacks a consideration of the profound conservation issues likely to arise due to the almost certain effects on the coastal and marine environment resulting from climate change. Oregon Shores believes that the prospect of climate change is one of the most serious strategic issue facing Oregon’s coastal and marine environment. We strongly urge ODFW to recast this document to clearly and strategically address conservation needs presented by rising sea levels in estuaries, rivers, and the ocean shore; the effects of acidification and of hypoxic conditions; changing levels and patterns of precipitation including the likelihood of extended droughts; and rising temperatures. The coming decade will be important in setting the direction for ODFW, other resource agencies, non-governmental organizations, and citizens to address these serious issues. We believe that ODFW’s current planning process is a key opportunity to embed these considerations into a nearshore conservation strategy for the coming decade and that failure to seize this opportunity could lead to a “strategy” that will be increasingly irrelevant in addressing coastal and marine resource conservation challenges presented by the effects of climate change.

Marine Reserves

The strategy should take advantage of the existing network of five marine reserves and other marine protected areas to address many of the research, monitoring, and management issues discussed in the draft. During the previous strategy period of 2006 – 2015, ODFW directed a significant amount of effort to the designation and implementation of the existing marine reserves, and is likely to continue to conduct program activities in these areas. These reserves are valuable assets to the State of Oregon for the long-term ecosystem-based management of nearshore marine resources and thus need to be explicitly addressed. In addition, the strategy timeframe includes a period during which it is highly likely that the effectiveness of the current marine reserves will be assessed by the Oregon legislature and potential expansion of the network may be considered. It is especially important that the strategy capture the opportunities presented by these reserves and articulate how the ODFW will take advantage of them to obtain data needed to assess their effects, along with plans for collecting data and information identified in this draft that are needed for management and conservation of nearshore marine species.

Coastal Watersheds and Estuaries

Oregon Shores fully supports the concept of the “land-sea connection” as an organizing principle for meaningful conservation of marine and coastal resources. However, even though the draft strategy briefly discusses the concept of the “land-sea connection” in resource conservation, this concept must be more fully developed to be meaningful. To do so, we recommend that the material pertaining to the Coast Range in the draft Statewide Conservation Strategy be incorporated into this document, and the analysis of coastal watershed conservation needs and issues be more thoroughly developed.



The strategy should also more thoroughly discuss and account for current real-world efforts to manage and restore Oregon's estuaries and expressly consider the effects of climate change on Oregon's estuaries. We recommend that the strategy include

- 1) an assessment of the current ecological and habitat conditions of Oregon's 22 estuaries, identifying priority issues to be addressed during the plan period, particularly related to the likely effects of climate change on these vulnerable, sensitive ecological areas;
- 2) an assessment of the effectiveness of Oregon's current estuary management program under Statewide Planning Goals 16 and 17, both of which are strongly protective of estuarine and shoreline habitats, to meet conservation needs and habitat restoration opportunities, especially in light of projected sea level rise;
- 3) consideration of the current efforts by and effective coordination among ODFW, the Oregon Watershed Enhancement Board, local watershed councils, the US Fish and Wildlife Service and other federal agencies, coastal Indian tribes, local governments, and non-governmental organizations to protect and restore habitat for salmonids and other coastal species such as Marbled murrelets; and
- 4) a discussion and assessment of current program activities within ODFW and with partners to address estuarine management and conservation issues, including the need for program capacity to address the multitude of issues likely to arise in estuaries and coastal watersheds due to effects of climate change.

Rocky Shores

The draft strategy discusses concerns with human impacts on rocky shores habitats but does not acknowledge the significant work already done by the ODFW, the Oregon Ocean Policy Advisory Council, Oregon Parks and Recreation Department, other state agencies, university researchers, and local community groups to document and address these impacts in rocky shore areas. The strategy should consider the specific measures ("management prescriptions") recommended in the Rocky Shore Management Strategy of the Oregon Territorial Sea Plan adopted in 1994 are directed to ODFW and other state and federal agencies to better protect rocky shore resources. ODFW was instrumental in devising these recommended actions for rocky shores within a comprehensive ecosystem-management context and so we urge that this conservation strategy address these measures as opportunities to advance conservation of these critical resources.

Fisheries Management

We urge that the strategy address ODFW's relationship to the initiatives of the Pacific Fishery Management Council (PMFC) to achieve ecosystem-based management of fisheries and key species in the Exclusive Economic Zone (EEZ), many of which are listed as "strategic species" in the matrices in the draft strategy. In particular, the PMFC has developed and adopted a Fishery Ecosystem Plan (FEP) that is intended to modify various fishery management plans to more fully



account for ecosystem effects of particular fisheries. The PMFC has also made available its ecosystem initiatives in support of the FEP. We recommend that the ODFW's nearshore strategy recognize, be consistent with, and support the ecosystem-based strategies of the PMFC, especially with regard to nearshore species for which ODFW has management authority.

Scientific Data and Information

The draft strategy contains many references to the need for more or better information by which to manage marine and coastal resources. However, the document contains no recommendations or steps for filling these data needs during the planning period. Oregon Shores believes that three conditions exist that should be accounted for in developing a data strategy:

- 1) **Marine Reserves:** the five existing marine reserves offer ODFW an outstanding strategic opportunity to fill many of the identified data needs pertaining to life histories of marine species, the ecological connections among estuaries, the nearshore ocean, and offshore marine environments, and the effectiveness of various management measures;
- 2) **Oregon Ocean Science Trust:** although the Oregon Ocean Science Trust, established in 2013 by the Oregon legislature, has yet to become operational, we urge ODFW to consider how that entity could serve to meet the need for data and information about the nearshore marine environment; and
- 3) **Marine Spatial Planning and On-Line Data Portals:** From 2008 to 2013, ODFW and other state agencies worked closely with university researchers, stakeholders, and non-governmental organizations to develop state-of-the-art digital marine spatial planning tools, an on-line data portal, and acquire significant new data sets and information about the nearshore marine environment and uses. These new data and mapping tools were applied by ODFW and other agencies to support the process of amending the Oregon Territorial Sea Plan for ocean wave energy and the process of designating the marine reserves that exist today. These data and tools should be fully considered in support of activities proposed in the new conservation strategy.

We recognize that developing a plan for identifying and acquiring needed data and information is a daunting task, but we believe the document should more fully account for present data and information conditions, identify priority information needs, and articulate a strategy for acquiring needed data during the plan period.

Strategic and Priority Species

The treatment of "strategic" and "priority" species should be clarified. The extensive list of Strategic Species in the draft contains many fish species for which the PFMC, rather than ODFW, has primary management authority or interest, as well as other species for which federal agencies such as US Fish and Wildlife Service have primary management authority. We urge that "strategic species" for purposes of this document be identified and listed based on criteria



that reflect strategic conservation needs and the ability of ODFW to effect conservation or management measures for them. Likewise, criteria need to be included and rationales presented for identifying certain species as “priority” as opposed to “strategic.” While all species are important ecologically, we urge ODFW to clearly articulate the basis on which certain species are identified as strategic or priority.

Overall, we recommend that the draft clearly identify and discuss the priority strategic conservation issues of importance to ODFW, articulate conservation goals and objectives to address those strategic issues, and offer specific activities to achieve those goals and objectives, with resources needed to achieve them, over the coming decade.

Oregon Shores appreciates consideration of these comments and looks forward to working with ODFW to carry out this important work.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip Johnson", with a long horizontal line extending to the right.

Phillip Johnson
Executive Director