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Ocean Policy Advisory Council  
c/o Andy Lanier  
Marine Affairs Coordinator  
Department of Land Conservation and Development  
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March 25, 2019

Comments re: the Draft Rocky Shores Management Strategy

Dear Chair Carter and members of the Ocean Policy Advisory Council:

The Oregon Shores Conservation Coalition commends OPAC's rocky shores working group for the progress it has made toward an updated and more comprehensive set of policies for managing and protecting Oregon's rocky intertidal and subtidal resources. Oregon made a good start toward a rocky shores management element of the state's Territorial Sea Plan (under Goal 19 of Oregon's statewide land use goals) in the early '90s. However, that earlier plan was never fully implemented, and it had not been revisited in a quarter-century. The current effort to develop a new Rocky Shores Management Strategy is much needed. The overarching objectives in the draft strategy are excellent, and Oregon Shores strongly supports the emphasis on cooperative management and ecosystem-based management.

We do have some concerns about provisions or what we consider omissions in the draft strategy. In addition to the comments below, we also incorporate our earlier recommendations, submitted April 9, 2018, by reference.

- We would argue that a regular timeline for periodic review and update of the strategy should be incorporated within the management strategy. The open-ended process for community-based proposals (see the next item) may help to keep the strategy updated, but does not substitute for a full-blown review of the entire strategy by all the entities cooperating in its fulfillment. In our earlier recommendations, we suggested 15-year intervals.

- We are concerned about the language in 4 a i, which states that “coastal stakeholders” are invited to submit proposed modifications at any time. This phrase is either meaningless or dangerously exclusive. Oregon’s shoreline and territorial sea resources belong (we might prefer to say “are in the keeping of”) all Oregonians, equally, meaning that all Oregonians are stakeholders in their conservation. All Oregonians should feel equally welcome to participate in the management of our rocky shore areas.
- The draft suggests somewhat vaguely that the opportunity for both agencies and “stakeholders” to propose changes is limited to designations of particular areas. The language used is that proposals “may include” designation, so it isn’t strictly exclusive. Still, we believe it should be clear that changes to the strategy of any type can be suggested at any time. We oppose limiting the number of such proposals to be considered in any given year (whether to five, as currently stated in Appendix 1, or any other number). It is unclear to us from the language of the draft whether management agencies are limited in their ability to propose changes; if that is the intent, we oppose it, and instead urge that management/resource agencies, like members of the public, be free to suggest revisions at any time.
- It is fine to encourage proposals with broad bases of support (“multi-stakeholder interests” in the language of the draft). Certainly, at some point in the course of considering proposed changes, it will be important to solicit input from diverse groups within affected communities. That said, the proposed initial approach (based on the “prompting questions”) is too daunting. Individuals or small groups with a good idea to suggest should not be confronted with the expectation that they engage in what could be a massive amount of community organizing before they ever come forward. We are agreed that management of our rocky shores should be science-based, and good science doesn’t depend on a social consensus. A lone biologist or naturalist (for instance) with a sound argument for why the resources of a given area would benefit from a higher level of protection shouldn’t be burdened with consulting with local chambers of commerce, fishing industries, tourism interests, etc., before submitting his or her idea. Rather, OPAC and the Coastal Management Program should set up a process for vetting initial proposals, and then, with proposals deemed plausible, assist proposers in bringing their proposals to affected geographic communities and communities of interest.
- Whether or not there is “a complex network of regulations and users,” subtidal areas should be subject to management changes proposed by members of the public along with rocky intertidal areas. There is continuity from lowest low water habitats to adjacent subtidal ones; ecology-based management would seem to require that proposals be allowed to relate to such linked habitats. We can see that there is a stronger argument for excluding subaerial reefs and islands, since these currently fall under the jurisdiction of

the federal government. However, recent political developments demonstrate that federal protection of public lands isn't necessarily permanent. Oregonians should be able to address the ways in which conservation concerns for these habitats are expressed in the state's Territorial Sea Plan, regardless of future federal actions.

- We object to footnote 3 at the bottom of page 4 of the draft. We certainly understand that adding new offshore marine reserves is not to be addressed as part of this process. However, we do not believe that modest alterations to better mesh marine reserves with this rocky shores management strategy should be categorically excluded. In our earlier recommendations, included here by reference, we advocated for a new designation of Intertidal Marine Reserve. Actual designations are not being considered in this phase of development of the rocky shores strategy, but we urge that the potential for creation of this designation be preserved. The goal is not to broadly expand marine reserves, but to bring coherence to management of the reserves by linking them to this level of protection of adjacent intertidal resources. This would, in effect, expand the reserves slightly, to beneficial effect in overall management of the reserves and of territorial sea resources; we strongly request that this possibility not be dismissed until the phase in which a full review of designations is undertaken.
- We enthusiastically support the emphasis on well-coordinated public communications about rocky shores, and on citizen science, in the Education and Public Awareness section of the draft. That said, this section needs a great deal of work. It includes statements that are too vague to be helpful: “Current education program providers **should** collaborate on a systematic approach to targeting audiences with agreed upon messages” (emphasis added). If this injunction is to be part of the adopted strategy, the very hard question of how resource agencies, educational institutions, aquariums, coastwide organizations like Oregon Shores, and local groups (e.g. Shoreline Education for Awareness in Bandon, “Friends of” groups for the marine reserves, etc.) are to coordinate must be addressed in the strategy, not just assumed. Stating that “This will require both financial and institutional support and coordination to achieve maximum effectiveness” is feel-good rhetoric without a strategy that identifies sources of such support. Airily stating that “**new** and already established locally-based and regionally supported programs are needed...” (emphasis added) is deeply questionable. There are already a great many organizations and programs operating on the coast, coordinating their efforts (as noted above) is a daunting challenge as it is, and the notion of fostering still more entities is a concept that should be the subject of very serious discussion, not blithely tossed off in the strategy document with no further justification.

- Following from the above, we suggest that #3 under Education Actions be rewritten to state “Support the extension of education and interpretation programs conducted by existing organizations to cover sites that are not currently covered.”
- We appreciate including citizen science in #8 under Education Actions, but consider the language of this item to be highly problematic. Here again, the word “stakeholder” creeps in. If this is meant to mean anyone who cares about the coast, then some other phrase should be found, because “stakeholder” in some minds connotes people with a vested economic interest in an area or resource. Non-profit organizations, which are not “stakeholders” in that narrower sense, are already heavily engaged in monitoring and citizen science. We aren’t sure what “developing a citizen science program that engages local communities and visitors” is intended to mean as part of this strategy. Is this suggesting that some entirely new program be developed, and if so, by whom? How would this relate to all the existing citizen science projects currently being conducted by Oregon Shores’ CoastWatch program, Audubon, Surfrider, COASST, land conservancies, local groups, and others? It is unclear whether some new, sweeping initiative is being proposed, in which case the strategy doesn’t remotely include enough detail, or whether this is again a vague statement wishfully hoping that all the many ongoing efforts be somehow coordinated.
- Following from the above, we suggest that the strategy be amended to abjure vague statements about education and citizen science, acknowledge that a wide range of activities are already underway that could use better coordination, acknowledge that sources of support (especially financial) for such coordination are unknown at present, and instead set forth as an objective a process (e.g., an education and citizen science “summit”) through which all existing entities engaged in education and citizen science can work together to develop a legitimate, fully worked-out strategy that can later be incorporated in this rocky shores management strategy.
- We differ from some of our colleagues in urging that the term “citizen science” be retained. We do so for two reasons. First, “citizen science,” under that banner, has become a growing and critically needed movement. If we are to track widespread changes in our increasingly stressed environment, we will need monitoring resources that vastly outstrip those of resource agencies and academia. As the draft correctly indicates, citizen science has a key role to play in managing Oregon’s rocky shores, as it does worldwide in addressing our changing environment. Switching the familiar term for symbolic reasons could confuse the issue and set this movement back. Equally important, we consider there to be a significant difference between “citizen science” and “community science”—the latter, often proposed as an alternative term, is instead needed to designate a particular type of citizen science. “Community science” is needed as a

term to indicate citizen science that actually is practiced at the community level—examples would be the Christmas Bird Count, or the “Community Science Teams” that Oregon Shores/CoastWatch is organizing at marine reserves, to pull together a variety of citizen science projects into a larger whole and communicate results back to neighboring communities.

- As a general point with regard to the strategy, we join with conservation colleagues in urging a stronger precautionary principle underlying the management strategy. The overriding goal must be to preserve our rocky shore habitats and resources. Where the effects of actions in the rocky shore environment aren’t certain, or sufficient information isn’t available, all agencies managing rocky shores should default to protection, as with the physician’s “First, do no harm.”
- While the draft strategy refers to climate change, no affirmative actions are set forth. We would propose two, at least: 1) Preserve and, where possible, restore kelp forests and other offshore vegetation, which serve as buffers and carbon sinks, not to mention providing critical habitat; and 2) begin a process of identifying onshore buffer areas that could be acquired to allow for future up-migration of rocky shoreline habitats.
- We understand that specific site designations will be considered during the next phase of this process. We do want assurance that before site-by-site designations are considered, proposed new types of designations will be fully discussed. As noted elsewhere in these comments, we include our earlier recommendations by reference. Those recommendations propose new types of designations (e.g., Intertidal Marine Reserve). If there will be an opportunity to fully explore this issue in the next phase, well and good, but if it is necessary that the types of designations be established in concept in the objectives and policies addressed by the current draft, we object to the failure to give due consideration to the structure of categories under which site designations will be made.

Thank you for the opportunity to make these comments. We look forward to continuing to work toward the development of this much-needed, comprehensive strategy for Oregon’s vital rocky intertidal, subtidal, reef, and island habitats.

Sincerely,

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

Phillip Johnson, Executive Director  
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