

Oregon Shores Conservation Coalition Recommendations For Strengthening the Protection of Oregon's Rocky Shores

Strengthen Commitment to Conservation of Rocky Shores

Oregon Shores notes that Oregon's rocky shores are priceless public treasures that define the Oregon coastal environment and are essential to the ecological richness of Oregon's nearshore ocean. We believe that the *Territorial Sea Plan* must be amended to express stronger, clearer goals and objectives for Oregon's Rocky Shores and proactively seek to protect them in the face of numerous stressors from climate change and increasing human use. The Oregon Department of Fish and Wildlife, in the Fact Sheet addendum to the *Oregon Conservation Strategy*, described the many ways that rocky shores are vulnerable to climate change and outlined the steps that can be taken to support climate-adaptive intertidal areas. We believe that the Rocky Shores Strategy must be managed with these factors clearly in mind.

Our recommendations pertain directly to strengthening the Rocky Shores Strategy in the *Territorial Sea Plan*. But what we really mean is that the Oregon Department of Fish and Wildlife (ODFW) and Oregon Parks and Recreation Department (OPRD) need to step up their efforts to protect these areas through regulations, enforcement, and on-site education and interpretive programs.

We believe that the Rocky Shores Strategy needs to:

- a. focus management attention and protection on areas with high visitation, areas with high habitat value, and areas suitable for long-term scientific research;
- b. reflect the designation of the five Marine Reserves;
- c. convey a clearer, stronger conservation message to the public ; and
- d. anticipate increased environmental stressors from effects of climate change.

Adopt Strategic Goals

Oregon Shores notes that the existing Rocky Shores Strategy has no overall goals or objectives. We urge the Ocean Policy Advisory Council to adopt strategic goals for rocky shores management. We propose the following overarching goals:

1. Protect and conserve the habitat, living marine resources, and ecological functions of Oregon's rocky shores for future generations;
2. Promote ecological resilience in the habitats of rocky shores and adjacent submerged areas;
3. Reflect and support the protection of adjacent Marine Reserves and Marine Protected Areas;

We also propose three operational goals:

1. Encourage community-based stewardship of rocky shores;
2. Review status of rocky shore management at least every 15 years.
3. Promote long-term scientific monitoring and research in rocky shores.

Changes to Rocky Shores Strategy Site Designations

Oregon Shores proposes the following changes to management prescriptions in the Rocky Shore Strategy at the following sites:

- A. Add a new designation of *Intertidal Marine Reserve*. Oregon Shores believes that rocky shores adjacent to or within the current Marine Reserves must be protected at the same level as the Marine Reserves. This will send a strong and consistent conservation message to the public. To do so we recommend a new Rocky Shore Management designation which, we urge, will be adopted by both the Oregon Department of Fish and Wildlife and the Oregon Parks and Recreation Department through regulation. We propose this new designation for the following eight sites:

Site 4. Cape Falcon: change *Not Yet Designated* to *Intertidal Marine Reserve* to conform to the designation of the entire headland as part of the Cape Falcon Marine Reserve via ODFW regulations.

Site 6. Cascade Head/Cliff Creek Cove: change *Habitat Refuge* to *Intertidal Marine Reserve* to conform to the designation of the entire headland as part of the Cascade Head Marine Reserve via ODFW regulations.

Site 11. Otter Crest: change *Marine Garden* to *Intertidal Marine Reserve*. The southern part of this intertidal area is within the boundary of the Otter Rock Marine Reserve, but the entire rocky intertidal area currently designated as *Marine Garden* should also be regulated consistent with the Otter Rock Marine Reserve designation.

Site 16. Part of Cape Perpetua: change *Marine Garden* to *Intertidal Marine Reserve* to conform to the designation of the entire headland as part of the Cape Perpetua Marine Reserve via ODFW regulations.

Site 17. Neptune State Park: change *Not Yet Designated* to *Intertidal Marine Reserve* to conform to the designation of the entire headland as part of the Cape Perpetua Marine Reserve via ODFW regulations.

Site 18. Strawberry Hill: change *Research Reserve* to *Intertidal Marine Reserve* to conform to the designation of the entire headland as part of the Cape Perpetua Marine Reserve adopted via ODFW regulations. Oregon Shores urges that this site continue to be managed as a research/educational permit area because of long-time scientific data sets acquired in the area.

Site 29. Redfish Rocks: change *Priority Rock and Reef* to *Intertidal Marine Reserve* to conform to the designation of the area as the Redfish Rocks Marine Reserve.

Add a New Site at Rocky Point: add a new rocky intertidal site at Rocky Point which is within the boundaries of the Redfish Rocks Marine Reserve that should be designated *Intertidal Marine Reserve*.

- B. Change *Not Yet Designated* to other specific designations. The following five sites were not designated for a particular management focus. Oregon Shores believes that current public use, public visibility, and future use are sufficient to warrant a specific management focus. We propose changes to the designations at the following sites to provide clearer conservation directives to responsible agencies and the public:

Site 2. Ecola Point/Sea Lion Rock and associated rocks: change *Not Yet Designated/Priority Rock* to *Habitat Refuge*.

Site 14. Seal Rock: change *Not Yet Designated* to *Intertidal Marine Protected Area*. Oregon Shores believes that the heavy visitor usage of the intertidal areas at this site requires a clear conservation message and strong regulatory protections. Even though there is no adjacent Marine Reserve, we believe this designation and strong protections through regulations are warranted.

Site 19. Heceta Head: change *Not Yet Designated* to *Habitat Refuge*. Although most of these rocky shores are inaccessible from land, Oregon Shores believes that the presence of the unique habitat of nearby Sea Lion Caves and isolation of the site deserve designation as a *Habitat Refuge*.

Site 26. Blacklock Point: change *Not Yet Designated* to *Habitat Refuge*. Although this area is somewhat remote and difficult to access, it is increasingly used from the adjacent state park accessed at Cape Blanco airport.

Site 31. Sisters Rock: change *Not Yet Designated* to *Habitat Refuge*. This site is now part of Sisters Rock State Park and as such is more susceptible to an increase in human use than in 1994 when it was in private ownership. A designation of *Habitat Refuge* will convey a clear conservation message for the intertidal area. The adjacent submerged areas, especially on the south side, are popular for SCUBA diving.

- C. Substitute the designation *Intertidal Marine Protected Area* for *Marine Garden*. Oregon Shores believes that although the term Marine Garden has been used by the ODFW for many years, it is ambiguous and does not sufficiently convey a clear conservation message to the public. We believe that the public has come to know the term Marine Reserve and will understand its usage as *Intertidal Marine Protected Area*.

Site 3. Haystack Rock: This is a premier destination for visitors coming from the Portland metro area and from around the world. Oregon Shores believes that the heavy use and high public visibility of this site warrants a strong, clear conservation message to support the efforts of the Haystack Rock Awareness Program and the U. S. Fish and Wildlife Service to protect marine resources and habitats.

Add New Site at Cape Kiwanda: This area was included in the 1994 Rocky Shores Strategy but was designated as a *Marine Garden* by ODFW at the request of a local citizen group not long after the Territorial Sea Plan was adopted in 1994. This area should be added as an *Intertidal Marine Protected Area*.

Site 13. Yaquina Head: Access from the bluff to the beach and rocky intertidal area at this site is controlled by the US Bureau of Land Management's Yaquina Head Outstanding Natural Area. Oregon Shores believes that designation as an *Intertidal Marine Protected Area* would assist BLM YHONA in offering a clearer, stronger conservation message consistent with the conservation message at nearby *Otter Rock Marine Reserve*.

Site 15. Part of Yachats State Park: A change from *Marine Garden* to *Intertidal Marine Protected Area* would be consistent with the Cape Perpetua Marine Protected Area as adopted via ODFW regulations.

Site 39. Harris Beach: Harris Beach is one of the most heavily visited coastal state parks and deserves a stronger conservation message for the rocky shores. We believe it should be designated as an *Intertidal Marine Protected Area*.

Changes to State Agency Regulations

Oregon Shores recommends that ODFW and OPRD amend their respective regulations to strengthen protection of rocky shore resources.

- A. The Rocky Shores Strategy should direct ODFW to amend its regulations to:
 1. Prohibit harvest of piddock clams in all areas. Piddocks are currently listed as and allowed to be harvested as "Other Clams." However, harvest of piddocks requires a tool to destroy the rock into which the clam has burrowed. Such destruction of habitat is not compatible with conservation of rocky shore ecosystems. Harvest of piddocks is specifically allowed in research reserves at Boiler Bay, Neptune State Park, Cape Arago, and Brookings as well as all areas that are not specially designated where harvest of marine invertebrates is regulated generally by daily bag limits.
 2. Reduce the daily bag limit for mussels; Mussels form a biostructured habitat that is important to many other species in rocky intertidal areas. Under current regulations, one or two harvesters could significantly affect a mussel bed. Reducing the limit will help to protect this biologically structured habitat from

destruction.

3. Eliminate harvest of the class of invertebrate species listed under “Starfish, Urchins, Snails, Shore Crabs, and all other marine invertebrates not listed.” These intertidal animals are critical components of rocky shore ecosystems. We know of no good reason to harvest them.
 4. Change the regulatory designation of *Marine Garden* to *Intertidal Marine Protected Area*. The term *Marine Garden*, as a designation, has been used by ODFW for many years. But the connotation of the term is confusing and outdated. These sites require a much stronger, clearer conservation and enforcement message. The term *Intertidal Marine Protected Area* sends a clear message and is compatible with the term Marine Protected Area currently used by ODFW adjacent to several of the Marine Reserves. OPRD should amend its rules to also prohibit the harvest or collection of seaweeds in these sites so that there is no question of the authority of the regulation.
- B. The Rocky Shores Strategy should direct OPRD to amend its regulations to prohibit harvest of marine algae (seaweeds) in two instances.
1. Rocky shore sites within boundaries of currently designated Marine Reserves. Even though ODFW regulations for these areas prohibit the harvest of seaweeds, it is not clear that ODFW has the authority to regulate harvest or collection of seaweed; and
 2. Intertidal Marine Protected Area (currently regulated as Marine Garden) areas.