

From: Gillian Lyons <GLyons@pewtrusts.org>
Sent: Monday, July 20, 2015 5:02 PM
To: ODFW NearshoreStrategyInput
Cc: Greg Krutzikowsky
Subject: Oregon Nearshore Strategy Comments

Dear Mr. Krutzikowsky:

Thank you for the opportunity to provide input on the Oregon Department of Fish and Wildlife's (ODFW) 10-year revision of the Oregon Nearshore Strategy (ONS). We appreciate ODFW's attention to the conservation of Oregon's nearshore resources, as well as the Department's efforts to ensure that the ONS remains a valuable and timely document for guiding management of those resources. In particular, we note a number of changes to and recommendations in the ONS that have the potential to enhance Oregon's management and protection of forage fish species in state marine waters: a linkage between the ONS and marine fishery management plans (FMPs), the inclusion of estuarine habitats in the scope of the ONS, and the addition of Pacific sand lance to the ONS's list of Strategy Species.

We are especially glad that the ONS recognizes the role that marine FMPs have the potential to play in the conservation of nearshore species. This new management tool will have its debut in the next several months in the form of a marine FMP for unmanaged forage fish, as described on page 25 of the ONS. We strongly support the inclusion of the development of marine FMPs as a key recommendation in the ONS under the category of Management and Policy; doing so will help to ensure alignment between Oregon's overarching goals and priorities for nearshore fisheries resources and its on-the-ground/on-the-water management and implementation efforts.

Similarly, we support the expansion of the scope of the ONS to include estuarine habitats. While we understand that estuaries were previously part of the Oregon Conservation Strategy, we hope that shifting significant portions of them into the scope of the ONS will allow for improved coordination among managers working to conserve marine and anadromous species that utilize and rely upon estuarine environments for at least a part of their life histories. Further, the inclusion of estuaries in the ONS provides the Department with a great opportunity to better address the linkage between forage fish management and the protection of forage fish spawning habitat. We anticipate that the marine FMP for unmanaged forage fish will include identification of spawning habitat for those species, but recommend that the ONS specifically articulate a suite of objectives for identification and prioritized protection of spawning habitat utilized by managed forage species, such as herring.

Finally, we applaud the addition of Pacific sand lance (an important forage species in the California Current Ecosystem, including off the coast of Oregon) as an ONS Strategy Species. We note that sand lance still appears on the Watch List in addition to the List of Strategy Species, and recommend that the Watch List entry be updated/deleted.

Thank you again for the opportunity to offer these brief comments, and for ODFW's work on this important document. We look forward to continuing to work with the Department as the ONS's 10-year revision is finalized over the next few months.

Sincerely,

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The Pew Charitable Trusts

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July 24, 2015

Dear Ms. Hatch and Mr. Krutzikowsky

Thank you for the opportunity to comment on the Oregon Conservation Strategy and the Oregon Nearshore Strategy Updates. This letter contains our comments on both documents. Audubon also appreciates the opportunity to participate in the stakeholder advisory group for the OCS Update.

Oregon Conservation Strategy Comments

General Comments

- 1) In general the OCS Update is a well written and thoughtful expansion on the work done 10-years ago. We are supportive of all of the addition of all of the key conservation issues added to the document.
- 2) We believe that Urban Ecosystems/engaging with urban audiences would be worthy addition to the key issues section. We view the increasing urbanization of Oregon's population and the changing manner in which the majority of the population interacts with natural resources as one of the biggest challenges and opportunities going forward in terms of protecting and restoring Oregon's wildlife and wildlife habitat. Far too little attention has been paid to this issue by ODFW to date. While we are pleased to see the expanded section on urban ecosystems in the ecoregion section, we believe it is worthy of being elevated to the level of a key issue.
- 3) We also would support the addition of restoration of Oregon's major inland lakes and wetlands as a key issue. Major threats to the Klamath Basin Wetlands, Lake Abert, Malheur Lake and Summer Lake place at risk an entire network of migratory bird habitat in the center of the Pacific Flyway. This goes beyond simply water allocations and includes issues such as invasive carp and conversion from flood irrigation in Harney County. We believe this worthy of its own section but at bare minimum should be given more attention in the Key Issues section on water.
- 4) We would encourage ODFW to add a section regarding internal agency implementation including minimum funding levels necessary to support the OCS. One of the biggest challenges over the past decade in terms of implementing the OCS has been the lack of internal resources within ODFW to support this effort. Without primary staff positions dedicated to manage ODFW OCS programs and engage stakeholders and the community in OCS implementation, the OCS will be of limited value.
- 5) We would like to see a section in the OSC that lays out priority initiatives for the next 2-5 years. While we realize that the OCS is meant as both an internal and external guidance document, we believe that it is critical that ODFW develop some priority initiatives to

galvanize support and engagement upon adoption of the revised OCS. ODFW should be able to answer the question "What are three to five priority initiatives that ODFW would initiate if it had funding to implement the OCS?" It should work with its stakeholder group to develop this list.

Document 1: Table of Contents, Intro, National Requirements, How to, Navigation Guide:

10-year Report: This section feels pretty random in terms of what is being acknowledged. It would be nice to see something a little more narrative and comprehensive as opposed to what read like somewhat random accomplishments. Also this list to the degree it is carried forward should include the development of the Intertwine Conservation Strategy which nests within the Oregon Conservation Strategy

It would be good to include a section on lessons learned or challenges that have been identified with the strategy over the past ten years.

Key Conservation Issues:

Chart on Page 2: The Cooperating Partners column should include more NGOs. This is a problem that repeats throughout the document--it is very heavy on acknowledging the role of public agencies and very weak on calling out the role of NGOs.

Page 15: While the Conservation Strategy is non-regulatory, it should not ignore the fact that the Statewide Land Use Planning Goals are regulatory. In addition to providing non-regulatory tools to protect fish and wild habitat, ODFW should also participate in the regulatory aspects of Goal 5 program development to ensure that the best available information is considered in terms of protecting important fish and wildlife habitat using both regulatory and non-regulatory tools.

Land Use Planning: This section seems to focus primarily on resources outside UGBs and ensuring that urban expansion does not encroach on natural resources. While containing urban sprawl is critical, the strategy should also explicitly acknowledge the importance of protecting natural resources inside UGBs. Our urban areas contain important fish and wildlife resources. It is important that the strategy recognize that fish and wildlife habitat inside UGBs need to be protected both to preserve fish and wildlife resources and to ensure that urban residents have access to nature in their communities—a feature necessary to promote livable compact urban form and promote a culture of conservation.

Land Use Planning-Clean Energy (Page 16) This section seems a bit anemic. The section should include a set of clearer actions designed to ensure that renewable energy siting is consistent with protection of fish and wildlife resources. It would be helpful to include actions referencing adequately funding state natural resource agencies to participate in siting processes, developing clear mitigation strategies for unavoidable impacts, and developing clear siting guidelines for the entire state. It would be good to see this section made more robust including data on existing landscape impacts as well as projected future landscape impacts.

Relative to other sections that have tremendous detail and clear explicit action sections (for example invasive species) this section feels cursory and superficial.

Floodplains (Page 34) The strategy should note that floodplains have been lost in order to facilitate urban development in addition to the reasons cited.

Floodplains (Page 37): Glad to see the section on "natural infrastructure" to address flooding. However this section could be clearer and stronger. Specifically:

- 1) Change "consider" to "promote" use of natural infrastructure in heading
- 2) Change "natural infrastructure" to "green infrastructure" in heading
- 3) Expand the narrative to define green infrastructure and list strategies including: removal of impervious surfaces, green roofs, green walls, bioswales, green streets, urban canopy, etc.
- 4) Reference examples such as the City of Portland Watershed Management Plan or the Clean Water Services Stormwater Program
- 5) Include a box that highlights a strategy such as urban tree planting

Floodplains: Include an action regarding working with municipalities and FEMA to modify local NFIP programs to promote, incentivize floodplain protection rather than floodplain removal as a strategy to meet federal flood insurance requirements. The strategy may want to reference the NOAA Fisheries Biological Opinion that will be released this summer providing guidance on how to ensure that FEMA Floodplain Programs do not result in adverse impacts to listed salmonid species.

Barriers: Add an action to "Promote strategies to increase permeability of urban landscapes for wildlife" including:

- 1) Protection of interconnected systems of urban natural areas
- 2) Protection of urban riparian corridors
- 3) Promotion of green infrastructure in the built environment such as urban tree canopy, green roofs, backyard and neighborhood scale restoration, etc
- 4) Reduction of hazards through programs to reduce nighttime lighting, promote bird friendly building design, placing power lines underground, etc.

The section could include a box featuring something like Friends of Trees Tree Planting Programs. of the Audubon/ Columbia Land Trust Backyard Habitat Certification Program which has certified over 3000 backyards in the Portland area.

Challenges and opportunities to landowner conservation: This section seems under-developed. It should include a more detailed description of the need to develop programs and work with landowners at all scales from urban backyards to big landscapes. This is noted but the section could provide more detail about why it is important to work at all scales and have programs targets at these different types of private property. For example in urban environments I would note that small private lots make up the majority of the land base—you cannot achieve conservation success on urban landscapes without engaging small lot property owners. This

section should also much more explicitly call out the importance of NGOs. The entire document is way too heavy in its focus on public agencies relative to the role of NGOs. Also it is "Soil and Water Conservation Districts" (not Soil and Watershed Conservation Districts).

Strategy Species

American Peregrine Falcon: Section should note that they also nest on manmade structures (bridges and buildings). Should note ongoing monitoring requirements under the ESA. Should reference ODOT management Plans for bridges. Should note continuing impacts of contaminants not only on wintering grounds but also in Oregon and also threats from recreational rock climbing, anthropogenic disturbance, poaching.

Streaked Horned Lark: listing status should note that it is federally listed as threatened.

Document 5: Species Data Gaps, Animal Concentrations and Diseases

The disease section should acknowledge the role of wildlife rehabilitators in identifying and responding to disease outbreaks.

Ecoregions:

Columbia Plateau Ecoregion discussion and issues should include extensive renewable energy development.

Northern Basin and Range: This section should include discussions of the following factors:

- 1) Impacts of climate change and reduced water availability for wetlands at Summer Lake, Lake Abert and Malheur
- 2) Invasive Carp which have infested Malheur Lake and decimated one of the most important waterfowl production areas in Oregon
- 3) Importance of retaining flood irrigation on the Silves Floodplain

Willamette Valley Ecoregion:

- 1) Factor Land Conversion and Urbanization: This section should note the importance of working both inside and outside UGBs to protect natural resources. As written the focus is pretty much outside UGBs. It should note the importance of integrating the built and natural environments inside UGBs through natural area protection, wildlife corridors and green infrastructure.
- 2) Factor Floodplains: This section should be made more robust including a discussion of the need to reduce floodplain development in urban areas.
- 3) Suggest adding a section: Wildlife Hazards Associated with Urban Areas including buildings, light pollution, collisions, cats, etc

Urban Ecosystems

- 1) The first line of this section is kind of awkward. I would rewrite as follows: "The importance of urban ecosystems in protecting and preserving biodiversity has been increasingly recognized in recent decades; many of the features that increase livability for people can also play an important role in sustaining native wildlife populations.
- 2) The reference to the Audubon program should be the Audubon Society of Portland/ Columbia Land Trust Backyard Habitat Certification Program
- 3) The Intertwine Alliance also includes NGOs. Its Biogeography Guide appears to be characterized here as a citizens guide, but it is more appropriately characterized as a step down from the Oregon Conservation Strategy that provides a very detailed high resolution description of the natural resource features of the urban landscape and a roadmap for future conservation efforts on this landscape.

Outreach Engagement Toolbox

Major Statewide Planning Efforts (Appendix): should include Audubon IBA Program
Conservation Plans (Appendix) Should include Intertwine Alliance Biodiversity Plan
Ecoregion Planning Efforts: Should include an urban section and reference plans like the
Portland Watershed Management Plan, Intertwine Biodiversity Plan, etc.

Other Comments:

- 1) Somewhere in this plan I think it would be good to acknowledge the role of wildlife rehabilitators. They play a huge role in terms of taking care of thousands of injured wild animals each year, educating the public about living with wildlife , helping identify and resolve threats to wildlife including disease outbreaks, contaminants and hazards. . ODFW needs to find a place to recognize their role in protecting Oregon's wildlife and promoting wildlife stewardship.
- 2) The plan should include a section on "Living with Wildlife." Especially in metropolitan areas, a big part of the challenge of protecting wildlife is managing human-wildlife interactions. There should be an action in this plan regarding providing resources to educate the public about living with wildlife and to prevent and resolve human-wildlife conflicts when they do occur. (Examples include outreach encourage people to leave young wildlife alone, to prevent intentional feeding and habituation of wildlife, to prevent holding of wildlife as pets, promoting landscaping to avoid bird nesting season, issues involving relocation of wildlife, etc....)

Nearshore Strategy Comments:

For our nearshore strategy plan review, we first provide general overarching comments and then provide more specific comments per chapter.

General comments:

- The strong points of the NSS include: thorough background information on coastal communities, species descriptions including real/potential threats and data gaps for those species, and nearshore habitats descriptions. This background is helpful in setting the stage for prioritizing and directing future management/research/conservation actions. On the flip side, there is a lot of detail on species/habitat that is probably not necessary. For example chapter 6 (nearshore habitats) currently contains detailed information on “species-habitat associations” which should be shortened/streamlined. If the reader wants more information, appropriate references to other literature should be cited (if it isn’t already).
- It is good to see linkage of the Native Fish Conservation Policy, Marine Planning Framework, and FMP process with the NSS. There can be stronger linkages made between how the NSS can help support and complement other efforts and plans. For example, there is very little mention of ODFW’s Marine Reserve program in this document. Given that the marine reserves were created in part as a “natural laboratory” for ecological monitoring, it would be best to make the marine reserves a larger part of the NSS plan in terms of targeting where some of the recommended research/monitoring should happen. The same can be said for human dimensions (socio-economic) monitoring. If there are other ODFW documents that already go into detail on marine reserve ecological monitoring objectives, they should be cited in the NSS and links provided.
- We recommend Chapter 8 (Research and monitoring needs) be removed and the information from that chapter be included at the start of the “Research and monitoring” section of Chapter 9 (Recommendations). Some redundancy could be eliminated by doing this and all of the research/monitoring recommendations would be in one contiguous section.
- Overall the research and monitoring section (Chapter 8 and part of Chapter 9) could be expanded on significantly:
 - There is a strong bias toward fisheries studies (there is mention of marine mammal interactions but this goal is targeted on the impact of marine mammals on fishery resources). While we agree that fisheries studies, monitoring, and management are critically important, other taxa (birds, mammals, inverts) and studies that examine interactive effects (e.g. seabird survivorship and forage fish stocks) need to be considered with equal import if true ecosystem-based management is embraced. While U.S. Fish and Wildlife may have jurisdiction over many of the seabird colonies, that doesn’t mean ODFW should place less emphasis on research/monitoring of these species groups in the NSS. In fact, inter-agency coordination is a key goal of the NSS (see pg. 154) so such collaborative efforts should be elucidated.
 - Many of the research/monitoring priorities are still quite vague. In some cases this may be appropriate as further prioritizing of strategy species may be necessary. We provide

some specific research/monitoring recommendations that should be considered for inclusion in the NSS below.

- There is a lot of emphasis on “additional funding needed” to carry out much of the objectives in this document however there is little discussion on mechanisms or strategies for increasing funding or support other than “cooperating with partners”. It would be worthwhile to provide more information or a stronger plan on strategies of how to leverage more funds for actions in the NSS.

Chapter 1 - Introduction

- For Figures 1.1-2.1 it might be helpful to shade the Nearshore area a slightly different color so the full extent of the area is more easily seen especially the estuary coverage.

Chapter 2 – Nearshore strategy context

- Typo pg. 16, second line: “mangemetn”, correct spelling
- Consider splitting Fig. 2.3a into 2 figures (North and central) – currently a pretty busy figure

Chapter 3 - Strategy Development

We are happy to see mention of the incipient unmanaged forage fish FMP in the “Non-extractive management issues” section (pg. 25). However, it would be worthwhile to include more specific information on how the new forage fish FMP will complement the NSS. Specifically:

- It is our understanding that the unmanaged forage fish FMP will include recommendations to identify data gaps in nearshore spawning habitat for currently unmanaged forage fish species (including sandlance, smelt), assess habitat loss risk to these areas, and propose monitoring of spawning grounds on a regular basis. However, it will not include currently harvested forage fish species (Pacific Herring, Northern Anchovy, Pacific Sardine) in the plan (pers. Comm. Caren Braby). Pacific Herring are nearshore spawners yet it is unclear if the location of all herring spawning grounds in Oregon is well-documented or if there is any need to increase protections in these areas. Therefore the NSS should clarify this and include a specific action/goal to “more cogently map out nearshore forage fish spawning (both unmanaged and currently harvested species) habitats along Oregon’s coast/estuaries as well as identify threats to these habitats”.
- Will eulachon spawning area identification/monitoring be a part of the Eulachon recovery plan that NOAA is currently working on? If so, cite that plan and when it is expected to be completed. If not, it would be good to include identification/monitoring/management of spawning grounds for eulachon as a target in the NSS.
- Typo, pg. 19, 6th line down: “strategyto”. Need space between words
- Typo, pg. 20, first cell of Table 3.1: “opportunitiespublic, Need space between words
- Typo, pg. 21, first cell of Table: need to include word “input”, currently only “i” is present.
- Typo, pg. 21, bottom cell of column 1: need to split: “Nearshore updated”
- The adoption of the NSS draft by the ODFW (at the Sept. 2015 ODFW Commission meeting) also includes another opportunity for public comment. Shouldn’t there be one more row to this table for final comments of public (taken at the Sept. 2015 Commission mtg.) to be incorporated in final draft? Seems like this could be done relatively quickly – Oct. 2015 for the final version.

- Typo, pg. 22, under the third bullet point (Ecosystem imbalances): “speciesere”
- On pg. 22 under the section “Information and dissemination to the public” include specific mention of “increasing outreach of Oregon’s recently designated marine reserves/protected areas in coastal communities and state-wide in close cooperation with relevant citizen’s groups, NGOS, and other entities”.
- Pg. 25: Under heading “communication and coordination (add engagement here?): Yes, add engagement!

Chapter 4 – Coastal Communities

This chapter has a good overview of population demographics and economic information for the coastal communities. There is a plethora of information on recreational and commercial fishing revenue yet detailed breakdowns of other coastal uses are lacking. In particular on page 33 the reference that wildlife viewing generates more regional economic contribution than hunting and fishing is noteworthy. I think a further breakdown on this statistic would be important to include in the NSS. For example, what is the breakdown in “wildlife viewing” (bird watching, whale watching, etc.), what is the revenue breakdown for these subcategories? What parts of the coast supports non-extractive uses more intensively and where there are gaps?

- Typo: pg. 29, under “General coastal Oregon population data”, sentence 7: “This situation has important implications which will ~~to~~ be subsequently discussed.”
- Typo: pg. 31, under “commercial fisheries”: Many port cities support active commercial ~~and~~s fisheries”

Chapter 5 - Species

Overall we are satisfied with the bird species chosen as Strategy, Watch list, and associated species. The process used to determine how these species were chosen is described on pages 47-49. We recommend a more specific listing of the sources of information used to prioritize species and include it in an appendix at the end of the plan. What experts were interviewed? What key scientific literature studies were used to inform the prioritization? For the bird species specifically: Was Oregon-specific CBC or BBS population trend data used? Was USFWS seabird trend information from the Oregon Coast National Wildlife Refuge complex used?

It may be worth taking a closer look at Harlequin Duck for consideration on as a strategy species or Watch list species. This species is a priority habitat species in Washington and there is an apparent paucity of information on population trends in Oregon¹. Few studies on Harlequin Duck wintering ecology in Oregon (depend on nearshore rocky intertidal habitats).

Specific comments for species in Table 5.1:

¹ Robertson, Gregory J. and R. Ian Goudie. 1999. Harlequin Duck (*Histrionicus histrionicus*), The Birds of North America Online (A. Poole, Ed.). Ithaca: Cornell Lab of Ornithology; Retrieved from the Birds of North America Online: <http://bna.birds.cornell.edu/bna/species/466>
doi:10.2173/bna.466

- Black Oystercatcher: could also put “small breeding population” in the “limiting factors” section. See Lyons et al. 2012. *Auk* 129: 645-652. We are happy to see this species included as Audubon is leading a citizen science effort to track population trend of this species in Oregon.
- Marbled Murrelet: Instead of “control and minimize forest predators including corvids” in the “conservation action” actions section we recommend stressing changing human behaviors to minimize corvid impact on murrelets rather than “control corvids”. Text should be changed to something like this: “minimize human-produced edible garbage through convenient and proper waste disposal receptacles & signage at camp grounds (to alert the public to the issue) near occupied or potential murrelet old-growth stands near/at areas of human use (e.g. campgrounds, etc).
- Eulachon: in “data gaps” include “Oregon-wide spawning ground search and identification of potential threats to known sites”
- Pacific Herring: under “conservation actions” include “ensure spawning grounds are protected from habitat loss”
- Longfin Smelt, Pacific sand lance, surf smelt, and top smelt: in “data gaps” include: “survey for and identify potential new spawning areas, monitor new and known spawning areas on a regular basis”
- Pacific Sand Lance is currently listed on both the Watch list AND on the Strategy Species list. We recommend retaining on the Strategy list (remove from Watch list).
- Because Pacific Sardine biomass estimates suggest massive declines in the California Current since 2009², we recommend moving this species from the Watch list to Strategy species list
- Include “Federal and state forage fish fishery management plan” in the “conservation action” section for all currently unmanaged forage fish species (in the plan currently only includes this action for surf smelt and top smelt)
- Typo: pg. 47, in first sentence in the “Nearshore Species” section change “develop” to “developing”

Chapter 6 – Nearshore habitats

We agree that the Coastal and Marine Ecological Classification Standard (CMECS) is a good system for classifying the nearshore habitats/ecology. We appreciate the nearshore habitat type descriptions. However, overall content in this section could be slimmed down. People can read up more on the ocean habitats elsewhere. Specific comments:

- Could perhaps streamline Tables 6.1 and 6.2. Overall
- Table 6.1 (Pgs. 80-82): standardize font style & check formatting of text. On pg. 80: footnote 5, include “of” between “addition” and “water”

² Hill, K.T., P.R. Crone, E. Dorval, and B.J. Macewicz. 2015. Assessment of the Pacific Sardine Resource in 2015 for U.S.A. Management in 2015-16. Preliminary Draft for SSC CPS Subcommittee Review on 6 March 2015.

- Page 113: Edit this sentence as follows: “Several seabird shorebird species that do not nest in colonies in Oregon do feed and take refuge here, including black oystercatchers, black turnstones, and surfbirds”.

Chapter 7 – Factors affecting species and habitats

This section is good – provides a very thorough table listing potential impacts to marine wildlife.

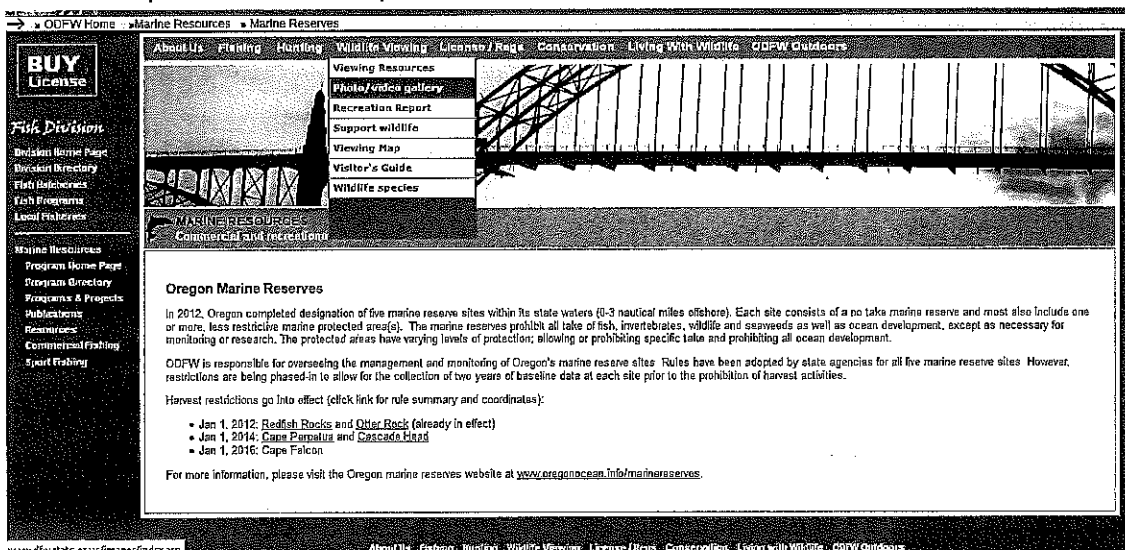
Chapter 8: Research and monitoring needs

As mentioned above, the brief text in this chapter could be moved to Chapter 9. Some specific comments:

- No mention of Marine reserves and protected areas. They should be a focal point of research in comparison to reference areas. Part of the reason marine reserves exist is to act as “natural laboratory”. ODFW NSS should be promoting these areas to focus research. Include links to existing marine reserve ODFW web resources.
- Under “ecosystem data” be more specific:
E.g. in the bullet “habitat variables that determine community structure” I would be more specific on what habitat variables and prioritize what to focus on first.

Chapter 9: Recommendations

- Under “Communication Partnerships” use the Oregon Marine Reserves Partnership (OMRP.com) as a good example of working with an NGO consortium to expand the reach of ODFW’s Marine reserve program.
- Under “marine program website” include:
 - This page should have a link to the Oregon Marine Reserves Partnership website (<http://www.oregonmarinereserves.org/>). Include above or below the Oregon Marine reserves website link (see figure below) or in a prominent place in the Oregon Marine reserves webpage. It would probably be helpful to include brief text describing the cooperative relationship between ODFW and OMRP.



- Under the “how” section for “marine program website” it should also be added that partner groups (i.e. OMRP, Redfish Rocks Community Team, Friends of Cape Falcon) can also help add capacity to ODFW’s website outreach. ODFW staff can just connect to information already a part of these other groups on-line outreach.
- Section 4 “media coverage”: Need more clarity here on how to ramp up social media. ODFW marine program should consider adding their own social media platforms (FaceBook, Twitter, Instagram) in addition to the pre-existing ODFW general ones. Consistent sharing of information between ODFW social media and partner group social media will greatly help connect public on events.
- Typo: page 145, under “Category: Research and Monitoring”, second sentence separate words “addressthe”
- 5 “Nearshore research and monitoring capabilities” (Pg. 145)
 - This section has little mention of bird projects (but does include marine mammals)
 - Add identification of forage fish nearshore spawning grounds as a priority
 - Specifically mention citizen science as a monitoring tool.
 - Pg. 148 under “How”, I would change the first sentence of the “Primary stage” section to say, “ODFW staff will work with university researchers and affiliates to identify priority species (from the subset of strategy species list included in this report) develop stock assessment...”
 - Pg. 148: There is only one sentence referring to assessments/monitoring indicators in the marine reserves. It would be a good idea to expand this section and elaborate more on some of the highest priorities for marine reserves ecological monitoring (or at least refer to an appropriate document that elaborates on this).
- Develop Fishery Management plans
 - Pg. 152: this section describes a separation of FMP development from conducting a resources analysis and developing fishery harvest strategy. Making it sound like a 2 step process. The framework document specifies that a resource analysis and harvest strategy are **part of** an FMP. Please clarify.
- Estuarine Fish and Wildlife Management
 - Typo: Pg. 153: remove semicolon: “ODFW,;”
 - Did they review the PMEP report?
- Prioritize spawning habitat identification for currently harvested species of forage fish. This is not planned to be included in the incipient unmanaged FF FMP so this will complement that. Citizen Science opportunity here (see: <http://www.nwstraits.org/our-work/forage-fish/>)

Chapter 10 – Conclusions

No comments

Thank you for your consideration of these comments.

Sincerely,

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Avian Conservation Programs Manager
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OREGON SHORES
CONSERVATION COALITION

July 20, 2015

Gregory K. Krutzikowsky
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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 that reads "Phillip Johnson". The signature is written in a cursive style with a long horizontal line extending to the right.

Phillip Johnson
Executive Director

WITNESS REGISTRATION

Oregon Fish and Wildlife Commission

August 7, 2015, ODFW 4034 Fairview Industrial Dr SE, Salem, OR

EXHIBIT H

PUBLIC HEARING ON: EXHIBIT H: Oregon Conservation and Oregon Nearshore Strategies

← will be written

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