



July 14, 2023

Lisa Phipps
Oregon Coastal Program Manager
Department of Land Conservation and Development
635 Capitol St. NE, Suite 150
Salem, OR 97301-2540

RE: Public comment for draft Yaquina Bay Estuary Management Plan and Estuary Statewide Guidance

Dear Ms. Phipps and Project Leads:

Thank you for the opportunity to comment on the update of the Yaquina Bay Estuary Management Plan (YBEMP). We are also providing recommendations for the forthcoming Statewide Estuary Guidance.

The Pew Charitable Trusts' (Pew) U.S. Conservation program seeks to sustain biodiversity and resilient ecosystems by collaborating with policymakers, communities, businesses, Tribes, and many others. Pew writes to support the update while also offering recommendations on how to ensure that this plan will respond to the climate resilience challenges the Oregon coast faces. We also recognize and applaud the hard work of the Steering Committee, comprised of the Oregon Department of Land Conservation and Development (DLCD), Lincoln County, the City of Newport, the Port of Newport, the City of Toledo, the Port of Toledo, the Confederated Tribes of Siletz Indians, and the project team, including land use consultant Matt Spangler, the Institute for Policy Research and Engagement, and facilitators at Willamette Partnership, to get to this stage.

Background

The Coastal Zone Management Act of 1972 laid the foundation for Oregon's coastal land use planning system. Statewide Planning Goal 16 prescribes the content of Oregon's Estuary Management Plans based on [15 CFR § 923.23](#) prescribing that a state may create additional management plans for "specific areas known to require additional or special management, but for which additional management techniques have not been developed or necessary authorities have not been established at the time of program approval". Although counties and cities use these plans for daily land use decision making, the plans are also frameworks for how the network of coastal partners in the federally-approved Coastal Management Program (Program) will work together to manage a complex, multi-jurisdictional landscape with conflicting resource needs and community uses. It is with this fundamental understanding that Oregon submitted Estuary Management Plans to the National Oceanic and Atmospheric Administration (NOAA) for approval as part of the Program for its 17 major estuaries nearly 50 years ago. In addition to state law, it is also an important part of the legal framework Oregon must work under to maintain its federal approval.

Recommendations

As guided by federal and state regulation, the YBEMP should be a roadmap to sustain community, culture, and the estuary, not only for local jurisdictions, but also for state agencies with authority in the estuary, decision makers, managers, Tribes, and the community at large; all of whom will be critical participants to solve the complex land use challenges we face because of rising seas, temperatures, precipitation, and more. Lincoln County Planning Department's 2014 economic analysis of the county focuses specific attention on commercial fishing, agriculture, timber, and tourism which all rely on the healthy and functioning estuary. Transfer payments and investment income, which comprise *nearly half* of the County's economic activity,¹ undoubtedly rely on the natural resources and scenic beauty Lincoln County's coast and estuary offer.

Conservation is a critical aspect of the state's land use planning approach, particularly for estuary management. Yet we are concerned that the YBEMP is being framed as a land use plan focused predominately on development², running counter to community needs and contrary to state law.³ Accordingly, we urge the Steering Committee and the state to return to a fundamental discussion of the challenges ahead and how estuary management plans can help increase resilience of the community and its resources. To that end, our recommendations start with the opportunity for strategic action to create climate-ready management plans that could be considered for both the draft YBEMP and the forthcoming statewide guidance. We provide additional recommendations for the guidance document that reflect our experience during the update process as members of the Advisory Group to the Steering Committee. Lastly, we provide specific recommendations for the draft YBEMP itself.

Components of Climate Ready Management Plans

As we begin to experience the effects of climate change locally⁴, all governmental land use and resource management plans must consider the impacts of climate change. Local government land use adaptation is a critical piece of the effort to prepare for a changing climate.⁵

Studies are revealing that transformational adaptation, often perceived as one major large-scale intervention, in practice, is a series of interventions and numerous small steps to adjust community culture, governance, and operations to a changing climate and resulting changes in land use and land cover.⁶ Land use planners and land managers need to understand the science of climate change⁷, be able to access natural resource and climate data at local scales, and need new tools and processes for

¹ The Research Group, LLC. 2014. [Ten-Year Update on Lincoln County, Oregon's Economy](#). Prepared for Lincoln County Board of Commissioners. Newport, Oregon.

² Comments by Planning Director, Onno Husing, Recorded Meeting Time 01:26 to 01:30, [Advisory Group Meeting #5](#), April 24, 2023.

³ See Oregon Revised Statute 197.010 (2)(a-b): "(2)(a) The overarching principles guiding the land use program in the State of Oregon are to: (A) Provide a healthy environment; (B) Sustain a prosperous economy; (C) Ensure a desirable quality of life; and (D) Equitably allocate the benefits and burdens of land use planning. (b) Additionally, the land use program should, but is not required to, help communities achieve sustainable development patterns and manage the effects of climate change.

⁴ Department of Land Conservation and Development. 2021. [State Agency Climate Change Adaptation Framework](#).

⁵ Measham, T.G., Preston, B.L., Smith, T.F. *et al.* (2011). [Adapting to climate change through local municipal planning: barriers and challenges](#). *Mitig Adapt Strateg Glob Change* **16**, 889–909.

⁶ Warner, K., Zommers, Z., Wreford, A., Hurlbert, M.A., Viner, D., Scantlan, J., Halsey, K., Halsey, K.D., & Tamang, C. (2019). [Characteristics of Transformational Adaptation in Climate-Land-Society Interactions](#). *Sustainability*.

⁷ Finn, D., E. Evans & K.A. Reed (2022) [An Urban Planner's Guide to Climate Information](#). Lincoln Institute of Land Policy Working Paper

using resource and climate data in planning processes.⁸ Based on Pew’s review of the relevant literature, we offer five components of climate-ready management plans to successfully manage land uses and resources under changing coastal conditions.

1) Climate Scenario Planning

Planning for a range of scenarios is important to prepare for and manage the inherent uncertainty planners and managers face in a changing climate. **Scenario planning** is a systematic tool for considering a variety of possible futures that include many uncertainties, rather than a focus on the accurate prediction of a single outcome.⁹ This tool is increasingly being used by public land management and wildlife agencies in concert with other decision making frameworks to help explain unforeseen trajectories, particularly in light of climate change.¹⁰ Traditional forecast-based planning helps identify outcomes for a specific future and usually assumes the future will resemble the past, which is the type of planning Oregon EMPs have previously undergone.¹¹ **Predictive modelling** can be helpful for both types of planning, however as models have become more sophisticated, their help in charting possible paths forward in an uncertain climate has become even more important. Data inputs for models that predict future conditions typically includes an assessment of species and their role in the ecosystem, weather patterns, and other ecological and environmental factors. Land use planning data inputs might include human population projections, the buildable acreage left after sea level rises, acreage of land that will become estuary, or acreage of land that might become too wet or too salty for some uses well before the area is inundated. Climate scenario planning includes consideration of **suited actions** that could be taken now to address changing conditions with the aim to decrease vulnerability and increase adaptation and resilience of ecosystems and communities dependent on them. A useful set of scenarios is **plausible** (based on best available science), **relevant** (focused on the management question), **divergent** (characterizes a range of future conditions), and **challenging** (effective for examining established practices and assumptions and fostering creative thinking).^{12,13,14} Scenario planning can be a highly participatory process or a technical service, depending on the context and management need.

2) Climate-related goals and strategies

Establishing goals and strategies is important to understand whether desired outcomes have been achieved and to define a clear path to achieve them. Specific goals, strategies, policy, best practices, and processes that help ecosystems and their associated species resist or adapt to identified climate change impacts (such as flooding, more frequent and severe storms, sea level rise, wildlife, drought and extreme heat) and other key stressors are identified and included. **Climate adaptation strategies** include policy language that helps managers respond to rapidly

⁸ Finn, D. and N. Miller. (2022). [Scenario Planning Using Climate Data: New Tools Merging Science and Practice](#). Lincoln Institute of Land Policy Working Paper.

⁹ Peterson, G., Cumming, G., and Carpenter, S. (2003). [Scenario Planning: A Tool for Conservation in an Uncertain World](#). *Conservation Biology*. 17. 358 - 366.

¹⁰ Rowland, E.R., Cross, M.S., Hartmann, H. (2014) [Considering Multiple Futures: Scenario Planning To Address Uncertainty in Natural Resource Conservation](#). Washington, DC: US Fish and Wildlife Service. Accessed July 9, 2023.

¹¹ Schuurman, G.W. et al. (2022) [Overcoming ‘Analysis Paralysis’ through Better Climate Change Scenario Planning](#).

¹² National Park Service. 2021. [Planning for a Changing Climate: Climate-Smart Planning and Management in the National Park Service](#). National Park Service. Fort Collins, CO

¹³ Rowland, E.R., Cross, M.S., Hartmann, H. (2014) [Considering Multiple Futures: Scenario Planning To Address Uncertainty in Natural Resource Conservation](#). Washington, DC: US Fish and Wildlife Service.

¹⁴ Kahane, A. (2012). [Transformative scenario planning: Working together to change the future](#). San Francisco: Berrett-Koehler Publishers, Inc.

changing conditions (*ie.* if *this* happens then do x, if *that* happens then do y) and can include sunset/sunrise clauses, triggers, and benchmarks among others. They may indicate when **identified thresholds** have been met or exceeded and require action by managers and planners. They may include **community or conservation targets** and a **schedule** for meeting them. Targets that are set may also act as benchmarks or triggers; when achieved, additional pre-determined management or land use actions may take place.

3) Systematic Monitoring

Systematic monitoring is critical for evaluating the effectiveness of land use planning decisions and selected strategies and activities aiming to achieve desired land use and land cover outcomes. Systematic monitoring of important indicators such as annual rainfall and temperature, status and distribution of key species that can serve as indicators of overall ecosystem health, is critical for informing threshold and benchmark-based policy and process. It requires a regular schedule and monitoring methodology for evaluating the effectiveness of management activities and determining what adjustments should be made to improve outcomes.

4) Adaptive Management

Adaptive management helps ensure management is appropriate, effective, and delivers the desired outcomes. Adaptive management is an intentional approach and iterative process to make decisions and adjustments in response to new information and changes in context. It doesn't necessarily change the prescribed goal, although that may be needed depending upon the new information and context. It is essential in situations where management decisions must be made under uncertainty. This approach has been used for many years by scientists and resource managers.¹⁵ It has taken on new importance with the growing pace and scale of climate change impacts.¹⁶ Adaptive management relies heavily on mapping and monitoring data and other information like **scenario planning and systematic monitoring** to adjust or improve the planned activities/strategies/goals within a management plan. It is difficult to implement an adaptive management approach if there is no support, capacity, or schedule for regular monitoring of resources or a commitment to effectiveness monitoring. Regularly revising management plans is a critical aspect of adaptive management and is mandatory to create and maintain community and ecosystem resilience in a changing climate.¹⁷

5) Collaborative Planning and Engagement

Appropriate incorporation of information from people impacted by management is important in designing management policies that meet local needs and are therefore supported. Engagement of local communities, Tribes, and especially vulnerable populations during the development of the plans and implementation of monitoring practices recognizes the needs and desires of people connected to the place. It can be a central part of **scenario planning**, important to **adaptive management** and essential to achieve **goals**, and increases the likelihood

¹⁵ Williams, B.K. 2010. [Adaptive management of natural resources—framework and issues](#). Journal of Environmental Management; 92 (5): 1346-1353.

¹⁶ Tompkins, E. L. and W. N. Adger. 2004. [Does adaptive management of natural resources enhance resilience to climate change?](#) Ecology and Society 9(2): 10.

¹⁷ Miller, B. W., Schuurman, G. W., Symstad, A. J., Runyon, A. N., & Robb, B. C. (2022). [Conservation under uncertainty: Innovations in participatory climate change scenario planning from U.S. national parks](#). Conservation Science and Practice, 4(3), e12633.

of identifying innovative solutions.¹⁸ Research shows that community engagement efforts, collaborative planning processes, and co-management agreements¹⁹ result in increased durability of the conservation outcomes sought by the plan.²⁰ Incorporating Traditional or Indigenous Knowledge and the consideration of cultural resources into these planning efforts yields more comprehensive products²¹ that draw greater community buy-in, holistic valuation of resources, and diverse array of commitments to stewardship of a place and implementation of a management plan.²²

Recommendations for the Statewide Estuary Management Plan Guidance

The update to the YBEMP was undertaken as a pilot process to inform a statewide guidance document that will help other local governments undertake the same effort using an approach that can be scaled depending on staff capacity and available funding. The new statewide guidance document is a critical tool for guiding updates of Oregon's seventeen major estuary plans particularly because the plans are forty years old. Overall, consistency between local jurisdiction efforts is greatly needed and highlights the importance of the state's guidance document. For example, Clatsop County just issued an RFP²³ to undertake the same work that will adhere to state regulation more closely than this update process.

In addition to considering a framework for multi-jurisdictional management plans to adequately address climate challenges described above, Pew offers the following recommendations for the statewide guidance document stemming from our participation in the update process.

Recommendation 1: Set a strong legal framework in the Guidance and clearly outline 'the possible' within current state and local authorities. Clearly outline the relevant federal regulations and the critical role multiple state agencies play in providing information for the framework of the EMPs that ultimately help land use planners implement this complex multi-jurisdictional area. Clarify the requirements of Goal 16 so local jurisdictions and the public have alignment on what is required and what local jurisdictions might take on voluntarily. For example, Goal 16 establishes a *minimum* classification of management units be established in a given estuary (natural, conservation, development); importantly it does not prohibit local jurisdictions from creating additional types of management units to address new resource or use goals or threats, like climate change impacts. Additionally, provide policy guidance that tiers to state policy (and plans) to draw clear relationship between local and state government as part of the Coastal Management Program beyond the relationship specifically between DLCD and local jurisdictions.

¹⁸ Adams D. and Hess M. (2001) Community in Public Policy: Fad or Foundation? *Australian Journal of Public Administration* 60(2): 13-23

¹⁹ Borrini-Feyerabend, G., Farvar, M. T., Nguingiri, J. C. & Ndangang, V. A. (2007) [Comanagement of Natural Resources: Organising, Negotiating and Learning-by-Doing](#). GTZ and IUCN, Kasperek Verlag, Heidelberg (Germany).

²⁰ Oteros-Rozas, E., Martín-López, B., Daw, T. M., Bohensky, E. L., Butler, J. R. A., Hill, R., Martin-Ortega, J., Quinlan, A., Ravera, F., Ruiz-Mallén, I., Thyresson, M., Mistry, J., Palomo, I., Peterson, G. D., Plieninger, T., Waylen, K. A., Beach, D. M., Bohnet, I. C., Hamann, M., ... Vilarly, S. P. (2015). [Participatory scenario planning in place-based social-ecological research: insights and experiences from 23 case studies](#). *Ecology and Society*, 20(4).

²¹ Berkes, F., Colding, J., & Folke, C. (2000). Rediscovery of Traditional Ecological Knowledge as Adaptive Management. *Ecological Applications*, 10(5), 1251–1262. <https://doi.org/10.2307/2641280>

²² Jantarasami, L.C., R. Novak, R. Delgado, E. Marino, S. McNeeley, C. Narducci, J. Raymond-Yakoubian, L. Singletary, and K. Powys Whyte, 2018: [Tribes and Indigenous Peoples](#). In *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II* [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. U.S. Global Change Research Program, Washington, DC, USA, pp. 572–603. doi: 10.7930/NCA4.2018.CH15

²³ <https://www.clatsopcounty.gov/commdev/bids-rfp/requests-proposals-update-comprehensive-plan-goals-16-17>

Recommendation 2: Provide clarification in the Guidance on how to update EMPs considering both Goal 16 (estuaries) and Goal 17 (shorelands) per state regulation. Statewide Planning Goal 17 outlines planning and management requirements for the lands bordering estuaries (as well lands bordering the ocean shore and coastal lakes). In general, the requirements of Goal 17 apply in combination with other planning goals to direct the appropriate use of shoreland areas.²⁴ Provisions in Goal 17 specifically focus on the protection and management of resources unique to shoreland areas; examples of such resources include areas of significant shoreland habitat, lands especially suited for water dependent uses, lands providing public access to coastal waters, and potential restoration or mitigation sites.²⁵ Additionally, Goal 16 states “When classifying estuarine areas into management units, the following shall be considered in addition to the inventories: 1. Adjacent upland characteristics and existing land uses; 2. Compatibility with adjacent uses; 3. Energy costs and benefits; and 4. The extent to which the limited water surface area of the estuary shall be committed to different surface uses.” To Pew’s knowledge, these specific questions were not answered during the YBEMP update and clarification should appear in the state’s guidance document.

Recommendation 3: Provide a list of new and emerging uses and recommendations for prioritization in the Guidance. The YBEMP update did not discuss new or emerging uses of the estuary. The guidance document should offer a list of new and emerging uses that local jurisdictions should consider during updates and recommend a list of legacy uses that should be deleted. Examples of potential emerging uses include seaweed farming, fiber optic cables, native oyster restoration, and renewable energy support infrastructure. Legacy uses that could be deleted include oil and gas extraction and gravel mining. Goal 16 already prescribes a *minimum* scale for prioritization,²⁶ The guidance document could offer additional prioritization based on whether that use exacerbates or increases resilience of the estuary in a changing climate.

Recommendation 4: Describe the State’s technical assistance role and list known coastwide project needs the Coastal Program plans on supporting as part of the Guidance. DLCD and the Oregon Coastal Management Program’s largest role in the land use planning system is as technical advisors and project leads. In this way, listing analyses and projects that are needed to update EMPs successfully in the statewide guidance document that partner state agencies can implement, will define the state’s role, explore the potential for the state’s role, and acknowledge that there are many needs that exceed a single County’s jurisdiction or interest. Creating this list as part of the document will also let local governments know what they do not need to take on themselves, and therefore, what they should focus their resources on. Some examples include:

- Technical assistance in partnership with the Oregon Department of Fish and Wildlife (ODFW) to update the resource inventory classification scheme ODFW completed for the creation of the original plans remains a major need for all estuaries. The categories of resources, as well as classifying them as significant, minor, and major remains helpful for this update effort.

²⁴ [OAR 660-015-0010\(2\)](#); Guidelines for Goal 17

²⁵ Ibid.

²⁶ “1) Uses which maintain the integrity of the estuarine ecosystem; 2) Water-dependent uses requiring estuarine location, as consistent with the overall Oregon Estuary Classification; 3) Water-related uses which do not degrade or reduce the natural estuarine resources and values; 4) Nondependent, non-related uses which do not alter, reduce or degrade estuarine resources and values.”

- Technical assistance in partnership with Department of State Lands to digitize state and private land ownership for tidal and subtidal lands in an estuary as well as digitizing legacy impacts/uses in order to help Tribal Nations determine where cultural artifacts have been buried or relocated to inform an updated resource inventory.
- Compiling decades of estuarine research into a technical document to ground the process in the best available science as well as creating a legal analysis of the current regulatory landscape in estuaries, including state and federal regulations, to align local land use decisions with the reality of the regulatory landscape. This information should inform local land use planning approaches and policies to a much greater degree they were in this update.

Recommendation 5: Create a state-hosted coastwide public-facing spatial data viewer accompanying the guidance that contains County resource inventories and additional curated data that is regularly updated. Spatial data, as we know it today, did not exist 40 years ago and should be leveraged to a greater extent than currently considered in this plan update. Spatial data analysis of large data sets can reveal problems and illuminate solutions planners and managers do not have the ability to see without aid of GIS tools. Climate and natural resource data continue to be refined to finer scales that are useful at the local level, however Oregon’s coastal counties and cities do not necessarily have GIS specialists on staff. Since the jurisdictions have the same data needs, DLCD should act as the clearinghouse and curator of estuary inventory maps and additional spatial data that would be helpful for planners, as well as network agency partners, to review to inform their daily government tasks.

Recommendation 6: Develop a plan to implement Goal 1 prior to starting an estuary plan update. Planning processes should be appropriately designed to enable participation of stakeholders and Tribal Nations. Longer timelines and working with small groups after larger group discussions can foster scenario planning discussions and new solutions.

Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process."²⁷ It requires each city and county to have a citizen involvement program²⁸ that addresses:

1. Opportunities for widespread public involvement
2. Effective two-way communication with the public
3. The ability for the public to be involved in all phases of the planning process
4. Making technical information easy to understand
5. Feedback mechanisms for policymakers to respond to public input, and
6. Adequate financial support for public involvement efforts

The goal also calls for local governments to have a committee for citizen involvement (CCI) to monitor and encourage public participation in planning.²⁹ Recommendations are included on DLCD’s [statewide Citizen Involvement Advisory Committee](#) page. Advisory group dialogue essentially took place over 6 months and without tools, maps, and data to support discussions, which did not leverage community input, knowledge, or expertise or provide time for feedback or iterative process.

²⁷ [OAR 660-015-0000 \(1\)](#): Goal 1 Citizen Involvement.

²⁸ Department of Land Conservation Development [website](#). Accessed July 10, 2023.

²⁹ Ibid.

Recommendation 7: Prior to starting an update of an estuary management plan, coalesce existing foundational spatial data and a synthesis of non-spatial research that will inform estuary policies, management unit classifications, unit descriptions, resource capabilities for each unit, and special policies per unit. Land use planners are not natural resource or cultural resource specialists, however the requirements of Goal 16 draw upon natural resource and cultural resource data and information to make policies, designate management units, and describe resources and management objectives “to maintain the integrity of the estuary.” Prior to starting any update effort, coalescing and synthesizing technical information that can be used by planners and the interested public is critical in order to support areas of non-expertise.

Recommendations for the Yaquina Bay Estuary Management Plan (YBEMP)

Specific comments for the draft YBEMP are below. Pew acknowledges the task at hand is significant and a holistic update to the YBEMP may need to occur in phases.

Recommendation 1: Incorporate more components of climate-ready management plans. Estuaries offer services that are opportunities to adapt to a changing climate, mitigate impacts, increase community and ecosystem resiliency, and reduce global carbon emissions. The YBEMP update can frame and offer opportunities and solutions available now, and opportunities available in the future, to secure communities and ecosystem function by leaning on the components of climate-ready management plans described above in this letter. Creating a climate-ready estuary management plan should be the ultimate goal of Lincoln County to ensure communities and the estuary are ready for future climate challenges.³⁰

Recommendation 2: Include policy, strategies, or actions that address Climate Vulnerability Assessment findings for individual land use applications. Pew is encouraged by the *Climate Vulnerability Assessment* that must be included as part of land use permit applications in the draft YBEMP. In fact, this new requirement is critical to help planners make better land use permit decisions and marks Lincoln County, the City of Newport, and City of Toledo as leaders in climate-ready land use planning in coastal Oregon. The guiding regulation (Statewide Planning Goal 16: Estuarine Resources) for the YBEMP is “to recognize and protect the unique environmental, economic, and social values of each estuary and associated wetlands; and to protect, maintain, where appropriate develop, and where appropriate restore the long-term environmental, economic, and social values, diversity and benefits of Oregon’s estuaries,”³¹ and cannot be achieved in the coming years without planning for changing coastal conditions. However, the draft YBEMP lacks any policy or decision outcomes related to what a project-level vulnerability assessment might conclude. An EMP responsive to climate should include policy or process that follows vulnerability assessment findings. For example, the plan should include environmental thresholds where additional land use planning action will be needed, resource or ‘use’ benchmarks that trigger review of certain land uses, and sunset clauses to disallow certain uses if conditions are no longer safe. Incorporating these elements will help avoid costly additional ‘comprehensive plan’ updates, while allowing more frequent minor climate-related ‘plan amendments’ as needed for the health and safety of the community and estuary.

Recommendation 3: Consider Goal 16 (estuaries) and Goal 17 (shorelands) together while updating the YBEMP. Generally, the Goals are intended to be addressed in a coordinated fashion during planning

³⁰Dalton, M. 2020. [Future Climate Projections for Lincoln County](#). Oregon Climate Change Research Institute.

³¹ OAR 660-015-0010(1): [Statewide Planning Goal 16: Estuarine Resources](#).

processes. See Statewide Guidance Recommendation 2 for details. Importantly, the update process failed to address a provision in Goal 16 which states, “When classifying estuarine areas into management units, the following shall be considered in addition to the inventories: 1. Adjacent upland characteristics and existing land uses; 2. Compatibility with adjacent uses; 3. Energy costs and benefits; and 4. The extent to which the limited water surface area of the estuary shall be committed to different surface uses.”

Recommendation 4: All 39 management unit descriptions should be updated with current resource information to guide planners in decision-making and inform the community. Natural resources drive Lincoln County’s economy, and the management of the estuary should be informed by the best available resource data to sustain them. The resource descriptions and management objectives for each unit in the draft, which are required by Goal 16, remain vague and based on decades old data from the original plan despite feedback from the advisory group that natural resource data and information was available and should be incorporated. The planning effort did not lean on the expertise of the science community on Yaquina estuary issues, nor the advisory or technical groups coordinated by the project team to update the unit descriptions. The management objectives should be meaningful and within the authority of local jurisdictions or partner state agencies for units in multi-jurisdictional plan. More attention should be given to creating special policies for each unit based on the resources within the unit, the management aims of its classification per Goal 16³², and changes the unit may experience, either from the human community or a changing climate. Please see the document recently submitted by community members³³ that contains a recommended outline for management unit descriptions of the draft YBEMP and illustrates inclusion of the best available natural resource information.

Conclusion

The task at hand is large, however pieces are in place to provide visionary and much needed leadership to prepare for the future. The needed governance structure was provided in 1972 via the Coastal Zone Management Act while Oregon’s framework for management was provided via Goal 16, Goal 17, the original estuary management plans, and resources classification system. Now, unprecedented amounts of federal funding for coastal resilience and planning are available to adapt and thrive in the coming decades. We must capitalize on this moment in time to ensure the estuary’s health into the future and help coastal communities adapt. Thank you for the opportunity to participate in the update of the YBEMP and to provide comments on the draft and the forthcoming statewide guidance document.

Sincerely,



Elizabeth Ruther
Officer, US. Conservation Program

³² OAR 660-015-0010(1): [Statewide Planning Goal 16: Estuarine Resources](#).

³³ See “Recommended Management Unit Template for Draft YBEMP. Submitted via email July 14, 2023