Exhibit D

Public Correspondence Received as of July 31, 2025

BORISCH Roxann B * ODFW

From:	Kevin Martin <kevindmartin63@gmail.com>
Sent:	Monday, July 14, 2025 7:40 PM
To:	OCS Revision * ODFW
Cc:	WHITTAKER Don * ODFW; WOLFER Brian H * ODFW
Subject:	ODFW SWAP Revision - Bighorn Sheep
Attachments:	ODFW SWAP Process - Letter - Final.pdf; ODFW SWAP - Bighorn Sheep-Final.pdf

Good evening, ODFW SWAP Team.

I know I've asked these questions before but have yet to get an answer.

Looking again at the latest update of Oregon's list of species on the SWAP - I see that Rocky Mountain Bighorn Sheep are on the SCGN list, but California Bighorn Sheep are not. Rocky Mountain BHS were on the SCGN list during the last SWAP version as well.

I'm curious what the difference is? We believe both are at risk to disease outbreaks. We are assuming that because there are presently strong populations of California Bighorn sheep (BHS) in the John Day and Deschutes rivers canyons this is likely why California BHS are not listed.

I would suggest that we had strong populations of Rocky Mountain BHS in Hells Canyon, the Wenaha, Joseph Canyon, along the Grande Ronde, Lostine, and Lookout Mountain until we did not due to disease. I would suggest we had strong populations of California BHS in the Owyhee, Tenmile and Rattlesnake herds until we did not due to disease outbreaks. I would suggest we had strong populations of California BHS in Potamus, the Pueblos, Abert Rim, and Hart Mountain until we didn't. I see no difference in the John Day and Deschutes California BHS populations - which are strong today but one pack goat, one misplaced solar farm using domestic sheep or goats, someone using domestic goats to treat weeds or a new private landowner that wants domestic sheep or goats or an aoudad carrying disease away from a disease outbreak through those populations.

Then we are back to starting over and spending millions of dollars to attempt to get the disease managed and the populations moving in positive directions - like we are today in Oregon's Rocky Mtn. BHS populations, like we are today in many of Oregon's California BHS - the Owyhee, Tenmile, Burnt River, Rattlesnake, the Pueblos, Abert Rim, and Hart Mountain populations.

When I talk with the Idaho Department of Fish and Game (IDFG) and the Washington Department of Fish and Wildlife (WDFW) bighorn sheep staff, they agree both should be and are on their SWAP. I'm curious why Oregon is looking at this issue differently?

What can we do to adjust the proposed list?

Thank you.

Kevin Martin
President, OR WSF

OREGON
WILD SHEEP
Foundation

Oregon Wild Sheep Foundation
5831 SE International Way
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Info@Oregonfnaws.org
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February 3, 2025

Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR, 97302

RE: Oregon Department of Fish and Wildlife (ODFW), State Wildlife Action Plan (SWAP).

The purpose of this letter is to share information from the Oregon Wild Sheep Foundation (OR WSF) and provide input into ODFW's SWAP revision process.

We, in the Oregon wild sheep family, strongly advocate for both Rocky Mountain and California Bighorn Sheep (BHS) to be identified as a Species of Greatest Conservation Need (SGCN) in Oregon's updated State Wildlife Action Plan (SWAP).

The State Wildlife Action Plan (SWAP) helps protect fish and wildlife species by identifying threats and conservation actions as well as outlining strategies to preserve habitats, restore ecosystems, and address the needs of species. The plan also suggests actions that partners across the state can take to support collective conservation action. This revision builds on the success of the 2006 and 2016 versions of the SWAP (the Oregon Conservation Strategy) and modernizes content to ensure that emerging risks and new information are represented. The future for many species will depend on landowners' and land managers' willingness to voluntarily act to protect and improve fish and wildlife habitat.

The purpose of the Oregon Chapter of the Wild Sheep Foundation (OR WSF) is to promote and enhance populations of indigenous wild sheep and rocky mountain goats. OR WSF, along with the Wild Sheep Foundation (WSF) fund initiatives, partnerships and projects throughout the State of Oregon and beyond to accomplish our purpose and mission. We support scientific solutions to

resource management challenges, and we invest in disease research, bighorn sheep transplants, habitat management, population management, predator management, and conservation education. We want to ensure that wild sheep populations and their habitats are effectively managed, accessible, utilized and supported by interested stakeholders.

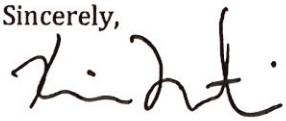
West wide, wild sheep populations are below agency goals in most jurisdictions, due to a variety of factors of which disease (primarily pneumonia), predation, harsh winter conditions, and climate are perhaps the most important. Our members, combined with State and Federal Agencies, Tribes and other NGOs, contribute many hours volunteering for wild sheep conservation projects, as well as generously donating critically needed funding to help keep wild sheep from the brink. Funding has been used to support transplants, telemetry studies, research, habitat enhancements (e.g., prescribed burning, water development, noxious weed management), disease surveillance and response strategies, predator management, education and a host of related programs. Trap and transplants conducted west-wide initially brought bighorn sheep (BHS) from Alberta and British Columbia to Oregon resulting in a modern-day wildlife success story.

Yet, BHS remains at risk of local population extirpation across Oregon, and species viability is directly affected by public and private management decisions and actions.

Pressure on Oregon's wild sheep will only rise with a growing human footprint across their range, changes in National, Regional and local wildlife politics, and increasing research and management costs. Each of our wild sheep populations is just a domestic sheep or goat contact away from extirpation. A new farm flock, a poorly managed allotment, a misplaced solar farm or vegetation treatment using domestic sheep or goats, a pack goat lost, and we are starting over.

Thank you for considering our thoughts and let us know how we can continue to assist in the SWAP revision process.

Sincerely,



Kevin Martin
President, OR WSF

Attachment 1: Oregon's Bighorn Sheep – ODFW's SWAP Revision

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Oregon's Bighorn Sheep

Oregon Department of Fish and Wildlife – State Wildlife Action Plan Revision

Attachment 1

The wild sheep family strongly advocate for both Rocky Mountain and California Bighorn Sheep (BHS) throughout the state to be identified as a Species of Greatest Conservation Need (SGCN) in Oregon's updated State Wildlife Action Plan (SWAP).

The Wild Sheep Foundation (WSF) and its Chapters and Affiliates actively fund initiatives throughout North America and beyond to accomplish its purpose and mission. WSF's overarching strategic goal is to ensure that wild sheep populations and their habitats worldwide are effectively managed, accessible, utilized and supported by interested stakeholders.

Funding generated has been used to support wild sheep transplants, telemetry studies, research, habitat enhancements (e.g., prescribed burning, water development, noxious weed control), disease surveillance and response strategies, predator management, education and a host of related programs. Trap and transplants conducted west-wide initially brought bighorn sheep (BHS) from Alberta and British Columbia to Oregon resulting in a modern-day wildlife success story.

West wide, wild sheep populations are below agency goals in most jurisdictions, due to a variety of factors of which disease (primarily pneumonia), predation, harsh winter conditions, and climate are perhaps the most important. Our dedicated WSF members, combined with State and Federal

Agencies, Tribes and other NGOs contribute thousands of hours volunteering for wild sheep conservation projects, as well as generously donating critically needed funding, to help keep wild sheep from the brink.

BHS remain at substantial risk of local population extirpation across the west, and species viability is directly affected by public and private management decisions and actions.

Throughout their range, BHS populations declined by an estimated 98% between the pre-settlement era and the 1950s. This abrupt crash was attributed primarily to respiratory disease caused by livestock pathogens. Remnant herds surviving until the 1950s were small, isolated, and vulnerable to stochastic disturbance and local extirpation. Besser *et al.* 2013 states:

> *"Bighorn sheep vanished from much of their historic range in North America during westward expansion in the early 20th century (Dice, 1919; Grinnell, 1928; Buechner, 1960). The precipitous decline in numbers, from 1.5–2 million in the 19th century to 15–18,000 in the United States by 1960 (Buechner, 1960) was not a unique phenomenon, as many other wildlife species' populations were similarly devastated during this era. However, the complete extirpation of bighorn sheep from much of their range, the slow rate of recovery despite intensive management efforts, and the recent listing of several U.S. populations as federally endangered (USFWS, 1998, 2000) sets them apart from most other North American ungulates.*
>
> *As with other species of wildlife, market hunting and competition with livestock for forage contributed to the decline of bighorn sheep (Spencer, 1943; Buechner, 1960).*
>
> *However, an unusual correlation between the introduction of domestic sheep (Ovis aries) and the rapid disappearance of bighorn sheep was noted by early investigators (Grinnell, 1928; Schillenger, 1937; Marsh, 1938). Pneumonia was recognized as an important cause of the decline by the turn of the 20th century and remains the most significant disease impeding recovery (Rush, 1927; Buechner, 1960; Gross et al., 2000; Cassirer and Sinclair, 2007)."*

Beginning in the 1950s, BHS herds were artificially reestablished in historic habitats through more than 1500 translocation operations. Thousands of hours and millions of dollars were expended to bring BHS numbers to the current total of 60,000/70,000 (WAFWA, 2023), just 4.8% of the pre-settlement population (WAFWA, 2015). Bighorn population growth since the 1960s reflects these extensive restoration efforts, as well as the continued contraction of the domestic sheep industry due to plummeting consumer demand. Herd re-establishment and augmentation has slowed in recent years, however, as research into the causes of pneumonia in BHS has advanced. Due to the

risk of disease-related die-offs or conflicts with domestic sheep producers, state wildlife agencies have become increasingly reluctant to reintroduce BHS in areas adjacent to those grazed by domestic sheep or BHS herds known to carry Mycoplasma or Pasteurella bacteria. Wildlife managers are therefore declining to reintroduce BHS into existing, suitable habitat for the establishment of new herds. Even some secure populations are limited due to fears of increasing the rate of contact with domestic sheep or goats, with ewe culls utilized to limit population growth and with foraying rams removed for undertaking exploratory movements characteristic of the species. Healthy populations of BHS are managed well below the carrying capacity of the landscape, with herds approaching this number almost nowhere in their range.

Domestic sheep and goats occurring in hobby or commercial flocks on private lands and Barbary sheep (aoudad) released to increase hunter opportunity in some areas, pose a huge risk to BHS as well.

Pneumonia-related die-offs continue to occur due to domestic sheep and goats in wild sheep habitat, and BHS population growth has stagnated throughout much of the west.

We would like to share the stories of several BHS populations across Oregon. We are doing this to demonstrate that without active, intentional, and costly management there is the real potential for losing this iconic species again. A species that is the icon of wild, backcountry across much of western north America. A species whose existence today is dependent on agencies, tribes and conservation organizations continued prioritization of time, policy, direction, and funds.

Oregon Wide - BHS were abundant in the canyons and mountains of Oregon when settlers arrived in the late 1800s. Two BHS subspecies are native to Oregon: Rocky Mountain and California bighorn. Expansion of American civilization without wildlife protection or management, and domestic livestock diseases led to their extirpation from Oregon by the mid 1940's. Present populations are the result of reintroductions and occupy only a small percentage of historic ranges. Land use changes have rendered some of the original wild sheep ranges unsuitable for occupancy, but there is still a considerable amount of suitable habitat into which bighorns have been or can be re-established. The Blue Mountains of Northeastern Oregon are a significant area for the Rocky Mountain subspecies, while California bighorn use habitats across the rest of eastern Oregon. BHS restoration in Oregon has been possible because of the generosity and cooperation of states and Canadian provinces contributing source stock, the assistance of dedicated individuals and groups such as the Wild Sheep Foundation (WSF), with their local Chapters & Affiliates(C&As), the

Oregon Hunters Association (OHA), the United States Forest Service (FS), the Bureau of Land Management (BLM), the Nez Perce Tribe (NPT) and Confederated Tribes of the Umatilla Indian Reservation (CTUIR), Confederated Tribes of the Warms Springs Indian Reservation (CTWSR) and funding provided by hunters through annual tag sales, auctions and raffles. In addition, the success of Oregon's program is due to the dedication of congress, Oregon Department of Fish and Wildlife (ODFW) and its commissioners, state legislators, sportsmen and women, and multiple individuals working together for a common goal.

The most significant threat facing BHS in Oregon is pathogen transmission from contact with domestic sheep and goats, often leading to disease outbreaks. The effects on BHS populations can take several forms, including acute all-age die off events, high mortality rates in lambs for decades following a disease event, and chronic or sporadic adult mortality. Pathogens associated with the respiratory disease complex are spread among inter-connected BHS populations over a period of years, resulting in mortality in multiple populations. Overall, respiratory disease will chronically limit BHS numbers and distribution. Additionally, any planning should address impacts to BHS habitat from invasive weed invasion, forest and rangeland succession and climate change. To ensure long-term viability any plan should include an analysis related to migration corridors and the potential for genetic exchange between BHS herds.

Rocky Mountain BHS populations in the Blue Mountains of northeast Oregon.
In the early 1970s BHS from Alberta were released in Hells Canyon. At the time experts believed overgrazing and hunting caused the loss of BHS population, but as time and research demonstrated bacterial pneumonia transmitted from domestic sheep was the main causal agent. This first release was in an active domestic allotment and the released BHS soon completely vanished.

The next release in the early 1970s was into the Lostine area, an area known for its historic BHS populations. At the time the disease issue was not well understood and biologists thought that not having BHS and domestic sheep on the same range at the same time was enough, unfortunately domestic sheep and goats wander, get lost, get left behind and contact occurs to the detriment of the BHS.

By the late 1970s there were about 100 BHS in the Lostine herd and ram hunting began in northeast Oregon. Trapping and transplanting also began with Lostine BHS trapped and moved to Bear Creek and later into upper Hells Canyon. The BHS in Hells Canyon were soon

exposed to domestic sheep bands on public lands and disappeared. BHS continued to be trapped and released in Hells Canyon with limited success. After many years of transplants, only 10 animals still existed in Hells Canyon. Primarily due to disease transmission to BHS and economic forces affecting the industry in 1996 domestic sheep allotments were closed in Hells Canyon and the Wallowa Mountains.

Reintroductions of BHS continued in the lower Imnaha area with some of the first BHS coming from Idaho in 1979. These were released on cattle allotments and did well. Releases continued throughout northeast Oregon throughout the 1980s, 1990s and 2000s with over 35 releases of 464 individuals from Alberta, Idaho, Washington, Colorado, Montana, British Columbia and Oregon. The WSF estimates an average cost today of about $5000 per BHS released, so this equals an estimated $2.3 million dollars investment for these releases.

During this time there were also multiple die-offs from disease. When BHS moved into domestic sheep and goat populations the result was always the same. BHS die-offs occurred in 1984 in Temperence Creek and 1986 in Lostine. Samples were taken from the dead BHS and sent to Dr. Bill Foreyt at Washington State University (WSU) for analysis. In the early '80s it was thought that the die-offs may be a result of lung-worm infections (*Protostrongylus sp.*) resulting in pneumonia infections. Dr. Foryet's specialty was wildlife parasitology, and it was through his efforts that it was determined that bacterial infection was the primary cause of BHS die-offs and the concept of separation between wild and domestic sheep populations was the only effective protection against pneumonia events in wild sheep.

Restoration work continued in the Hells Canyon area until 1995-1996 when a die-off occurred due to contact with a domestic goat on private lands upriver from Asotin, WA. In an attempt to stop the outbreak, it was determined that all the BHS in the local population would be removed and taken to the Idaho Wildlife Health Lab or by lethal means whichever was possible. Unfortunately, we were unsuccessful in depopulating the area of BHS. This epidemic spread between BHS populations up and down the Snake, Grande Ronde, Wenaha Rivers and Joseph Creek canyons. Over 330 BHS from three states died from the start of the epidemic in November 1995 to its end in July 1996. Mortality was as high as 95% in some populations.

Lamb survival plunges for years following a disease outbreak. Surviving ewes can show little disease evidence and lamb numbers can look good in the spring, but by early summer lambs begin dying and by fall most are gone. Dead lambs in the 1995-96 die-off were taken to the WSU diagnostic lab where pneumonia deaths were confirmed. Following a disease event BHS herd recovery is very slow if at all.

The Hells Canyon Bighorn Sheep Initiative (HCI), formalized in 1997, includes much of the northern and eastern Blue Mountains and has been an official BHS partnership since the 1995-96 die-off. This was the first large landscape, multiple state, tribe and State and Federal agency partnership developed specifically for BHS. Partners include the States of Oregon, Idaho and Washington, WSF, OR, ID, and WA Chapters WSF, FS, BLM, NPT, and CTUIR.

In the years that followed the HCI became a laboratory for field study of BHS disease. There was continued investment and research that identified Mycoplasma ovipneumoniae (Movi) as a significant bacterium that predisposed BHS to disease and die-off episodes. It was discovered that following a die-off there were still BHS that carried Movi that infected lambs and other naive BHS resulting in death. This initiated the use of test and remove, where the carriers (spreaders) were identified by capture then testing and removed from the population.

We are actively monitoring another ongoing disease event in the HCI area as we write this. The origin of these outbreaks has been documented as domestic sheep and/or goat strains of *Mycoplasma ovipneumoniae* (Movi); which continues to have lingering effects. Many of these populations have not recovered, and are currently limited by low lamb survival, primarily due to persistent pneumonia-caused mortality. Pathogen transmission to BHS is controlled by maintaining spatial and temporal separation between BHS and domestic sheep and/or goats.

We need to understand that the experience of seeing BHS along the eastern Oregon rivers, roads and trails was not always available. BHS were extirpated from the entire state of Oregon, they were gone. BHS are only here for folks to experience and enjoy, due to the massive annual efforts of agencies, tribes and conservation organizations that have been willing to invest time and money in the efforts to bring them back and then continue these efforts to keep them in the landscapes.

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As you can imagine this is very expensive and intensive work. The partners in the Hells Canyon Initiative are investing over $900,000 dollars this year (2025) and invested about $775,000 the year before (2024) to accomplish these activities with the hope to continue to provide healthy BHS populations on these landscapes. You can imagine the investment since this work has been going on for 27 or more years and the BHS populations are still at risk.

BHS populations on the Hart Mountain National Antelope Refuge, US Fish and Wildlife Service (Hart NAR) in south central Oregon –

California bighorn sheep were extirpated from Oregon by 1912. In 1954 California bighorns were successfully reintroduced to Hart NAR when 22 sheep were trans-located from Williams Lake, British Columbia. Population growth rates were nominally and consistently positive until the population reached an estimated peak of approximately 600 sheep by 1992. During this period of rapid population growth, Hart NAR served as the primary source herd for California bighorn in Oregon (as well as portions of Idaho and Nevada). Trapping efforts resulted in 673 BHS being removed from Hart NAR for translocation purposes from 1969 – 2003. Additionally, 385 rams were legally harvested during the same period.

By 1996 the herd was in decline and by 2004 the population was estimated to be ~300 individuals. During the period of decline, observed lamb ratios indicated the population should be increasing. As a result of these observations, USFWS and ODFW initiated a research project to evaluate adult survival and the cause of any mortality from 2004-2008. Twelve rams and 37 ewes were captured and fitted with VHF radio transmitters and monitored. Disease sampling revealed no exposure to diseases of concern, and further disease sampling efforts using advanced techniques have continued to indicate no exposure to pathogens. Nineteen BHS died during the study resulting in annual survival rates of 83% and 89% for adult males and females respectively. Cougar predation and probable cougar predation accounted for 63.2% of all mortalities.

The BHS population has declined by almost 70% since 2017 from approximately 150 animals in 2017 to as few as 48 in 2020. Consequently, the herd was at risk of extirpation in the next few years without prompt management intervention. In response to the decline, the Sheldon-Hart NWR has developed a BHS management plan, and associated actions

needed to restore the herd to a sustainable population level. The plan reflects the urgency to implement short-term management actions that are based on the best available science, in combination with mid- to long-term management and monitoring. The plan includes a combination of habitat management and predator control actions.

The loss of the Refuge BHS population would represent a disturbance to historical ecological interactions between other species, would represent the loss of a species native to the Refuge, would be a significant loss to the natural quality of the Poker Jim Ridge Proposed Wilderness Area, and ultimately would be detrimental to associated predator populations over the long term.

Bighorns from Hart were used as the primary source herd from 1971 to 2003 for transplants to available habitat across the state. Since 2003 the primary source herds are found in the Deschutes and John Day River canyons, which were initially started with sheep from Hart. Using the WSF current estimate of $5000 per sheep captured and relocated the 673-bighorn transplanted from Hart to available habitats in Oregon, Idaho and Nevada represents a $3.4 million dollar investment in California bighorn sheep management. Currently USFWS is funding activities identified in the Hart NAR bighorn management plan at $100,000 per year and WSF grants added an additional $100,000 for cougar and habitat management in bighorn habitat on the refuge, and $23,740 for radio collars.

Unlike the rocky mountain herds in northeast Oregon, pneumonia related disease has not been an issue for BHS on Hart. Cougar predation has been proven to negatively affect BHS populations on Hart as well as in New Mexico and Arizona. The impact of cougar predation is exacerbated when bighorns share range with mule deer because the deer act as a buffer species for cougar. Irrespective of whether the issue is disease or predation retaining a healthy population of BHS in available habitats of Oregon requires active management and the continued commitment of agencies, tribes and conservation organizations.

The **Lower Owyhee BHS population of Oregon** is part of the Idaho, Oregon and Nevada (ION) Partnership area. The Wild Sheep Foundation (WSF), Idaho Wild Sheep Foundation (IDWSF), Oregon Wild Sheep Foundation (OR WSF), Elko Bighorns Unlimited, Nevada Bighorns Unlimited (NBU), Nevada Bighorns Unlimited-Midas Chapter, and Nevada Bighorns Unlimited-Fallon Chapter all support this multi-jurisdictional management for a Wild Sheep. We are in the third year for the Partnership.

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The Lower Owyhee herd is the state's third oldest reintroduced California bighorn sheep herd, established in 1965. This herd grew to over 400 bighorns by 2015 when a Movi outbreak began in October 2015. The combination of very rugged terrain and bighorns being very wary of helicopters has made locating bighorns very difficult. To address this issue multiple survey methods were used to establish a base line population. This information was used to determine management options and the next steps. These next steps include continuing Test and Remove (T&R) methods to identify carriers and clear Movi from these free-ranging bighorn sheep populations.

The Lower Owyhee BHS population had a 35:100 lamb ewe ratio, and supported 9 hunting tags in 2015. In 2016-2017, 80% of the population died of pneumonia. The lamb ewe ratio was 13:100 in 2016, and zero tags are now available.

Test and Remove (T&R) methods were developed and proven in the Hells Canyon Initiative and endorsed by the Wild Sheep Working Group's west wide Disease Management Venture (DMV) to identify carriers and clear Movi from free-ranging bighorn sheep populations. The T&R effort is being conducted in bighorn sheep populations in the Santa Rosa Range and Snowstorm Mountains of Nevada and the 10 Mile/Rattlesnake Herds in Oregon. These bighorn herds are part of an interstate metapopulation that both states have acknowledged and have been collaboratively managing for over a decade. The objective is to test adults and monitor lambs in these free-ranging bighorn sheep populations to identify and remove chronic Movi carriers from the various herds and subherds.

Bighorn sheep are known to cross the state boundary between Oregon and Idaho along the Owyhee Front towards Jacks Creek. In 2015, Leslie Gulch, Oregon (Lower Owyhee population) on the western side suffered a severe pneumonia outbreak and has not recovered. Oregon is working on a plan to address concerns in sheep populations along the Oregon/Idaho border in the Lower Owyhee. IDFG will continue collecting information as well. An aerial survey will be completed, including gathering total numbers counted during the survey and lamb:ewe:ram ratios. Additional information is needed to understand the possible impacts of predation. Lamb survival has been lower than desirable and fall surveys will be conducted to assist in this information gathering.

This partnership is also increasing genetic diversity and recreational opportunities with the transplant of California Bighorn sheep into the Trout Creek Mountains of SE Oregon from the John Day populations and the Calico Hills/High Rock Canyon, Nevada from the Deschutes populations. The Sheldon National Wildlife Refuge core bighorn herd area in the Virgin/Hell Creek drainages is also a strong candidate for future bighorn augmentation and will continue to be evaluated.

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Pressure on Oregon's wild sheep will only rise with a growing human footprint across their range, changes in National, Regional and local wildlife politics, and increasing research and management costs. Each of our wild sheep populations is just one domestic sheep or goat contact away from extirpation. A new farm flock, a poorly managed allotment, a misplaced solar farm or vegetation treatment using domestic sheep or goats, a pack goat lost, and we are starting over.

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BORISCH Roxann B * ODFW

From: Ann Vileisis <ann@kalmiopsisaudubon.org>
Sent: Tuesday, July 15, 2025 10:36 AM
To: OCS Revision * ODFW
Subject: Query about relevance of possible comment letter on serpentine fens

Hi Carolyn,
I am writing to figure out if it's worth adding a comment into the SNAP public process the hopper regarding some unique habitats we have down here in SWO —serpentine fens. These are groundwater dependent ecosystems with communities of rare plants.

The state was part of a conservation agreement for these ecosystems back in 2006 —and I see that it was not part of a more recent conservation strategy completed by federal agencies in 2018.

The reason I am reaching out is to determine if you already considered this topic, and it no longer fits into your framework. But if, instead, it just fell off the radar, I'd like to submit some comments. It seems like it could be added to that unique habitats part of the plan. (There are other small, distinctive habitats in that list) You may feel they already fall under seeps, springs and headwaters or spring fed streams—but they are really their own interesting habitat.

Also, many but not all of these habitats are on federal land —but given changes these days, I am thinking it might be important to have them listed in state plans too.

I know the plan seems to be focused on wildlife but I am glad to see that it continues to include plants too, as I am a conservation advocate that has leaned on Oregon Conservation Strategy status to advocate for plants, wildlife and habitats —and of course all are connected.

I have been aware of the long process you've been working through and hate to be someone who chimes in at the last minute —but I didn't have time to participate all along.

Please let me know if you think it's worth my sending a comment letter on this topic.

Thanks for your work on this important project of updating Oregon's wildlife action plan!

Ann

Ann Vileisis
President
Kalmiopsis Audubon Society
P.O. Box 1265
Port Orford, OR 97465
541-253-6302

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Tuesday, July 15, 2025 12:35 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#54]

Are you an Oregon resident? Yes

Email cheryl_strong@fws.gov

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

COASTAL DUNES

line 30: note that the Siuslaw hairy-necked tiger beetle has recently been found by the USFWS to not be a genetically distinct subspecies. Report will be out in the next few months.

line 36 hybridization with another non-native invasive grass: Ammophila breviligulata, American beachgrass

line 37 native encroachment by shore pine and other species is also a major issue

line 56 especially off leash dogs which are prone to chasing birds on the beach

line 73 how does this correlate with the 90% loss (which I think is accurate) listed above in line 24?

BORISCH Roxann B * ODFW

From:	Kevin Martin <kevindmartin63@gmail.com>
Sent:	Thursday, July 17, 2025 11:15 AM
To:	OCS Revision * ODFW; WHITTAKER Don * ODFW
Cc:	WOLFER Brian H * ODFW; Camille Brooks; Andrew Wildbill; erick@nezperce.org; Larry Jacobs; Carl Scheeler; Craig Foster; Corey Mason
Subject:	Re: ODFW SWAP Revision - Bighorn Sheep
Attachments:	ODFW SWAP Process - Letter2 - Final.pdf

Good morning, SWAP Revision Team and Don.

Thank you for the information and discussion at last nights SWAP call.

Please see the attached letter from Oregon Wild Sheep Foundation as additional input to the process.

Thank you.

Kevin Martin
President, OR WSF

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July 17, 2025

Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR, 97302

RE: Oregon Department of Fish and Wildlife (ODFW), State Wildlife Action Plan (SWAP).

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Thank you for the information and discussion last night on the State Wildlife Action Plan (SWAP) meeting.

I'm sure you are tired of the Oregon Wild Sheep Foundation (OR WSF) commenting about what we see as the need for California Bighorn Sheep to be included, with Rocky Mountain bighorn sheep, as a Species of Greatest Conservation Need (SGCN) in the final SWAP document. We continue to do so

as we see the importance of this document and how it can assist in the management of Oregon's bighorn sheep populations.

OR WSF is less concerned that the document will drive Oregon Department of Fish and Wildlife's (ODFW) actions and activities. ODFW is already all in with the Wild Sheep Foundation (WSF) and the OR WSF in the investment and management of Oregon's bighorn sheep. We have a wonderful partnership and work closely together across the state and even across state borders with our neighbors. Together we have been engaged in Northeast Oregon in the management of Rocky Mountain bighorn sheep since the mid-1990s. This is the Hells Canyon Initiative and now the Tri-State. We have been working closely together on Oregon's California bighorn sheep populations as well. We have the Idaho, Oregon and Nevada (ION) Partnership in southern/southeastern Oregon and we have been working together with the federal land management agencies across eastern Oregon.

One of our next project proposal is called "Coming Home - A Proposal: California Bighorn Sheep Translocation from Oregon to British Columbia". As you know bighorn sheep were extirpated in Oregon, but thanks to British Columbia (BC) translocating California bighorn sheep to Oregon in 1954, we now have them back. The populations in BC where these original bighorns came from are having the same disease issues today that wiped out our bighorn sheep. Oregon, thanks to Don's leadership, is looking to return the favor and send BC California bighorns back home to improve BC's populations. I guess it shows you that even today historic strong populations of bighorn sheep can have disease issues that can reduce their numbers to where they need assistance and augmentation.

This is a long-winded way of saying, when OR WSF looks at the SWAP, we see the value to ODFW, but we see a much larger value to the other state, local and federal agencies and/or individuals that will utilize it. The SWAP is where the State of Oregon is identifying those species that may need an additional look before a project is undertaken. Species that have additional risks that others need to recognize and think about. This is where the federal agencies will look as they develop sensitive and unique species lists for planning. This is where other state agencies will look to see which species in a particular place may need a more refined review. This is why our neighbors at Idaho Department of Fish and Game (IDFG) and Washington Department of Fish and Wildlife (WAFW) have both Rocky Mountain and California bighorn sheep on their upcoming SWAPs. Not for themselves but for those who are going to utilize this information. This is also why OR WSF is on the agenda for an upcoming WSF Conservation Committee call advocating that other WSF Chapters & Affiliates get engaged, if they are not already, in their individual State SWAP processes.

In the end, we are still concerned that one pack goat, one misplaced solar farm using domestic sheep or goats, someone using domestic goats to treat weeds or a new private landowner that

wants domestic sheep or goats or an aoudad carrying disease away from a disease outbreak through those populations. If the concern is not identified somewhere how are folks to know.

We are then back to spending millions of dollars to attempt to get the disease managed and the populations moving in positive directions - like we are today in many of Oregon's Rocky Mtn. and California BHS population.

BHS do remain at risk of local population extirpation across Oregon, and species viability is directly affected by public and private management decisions and actions.

Pressure on Oregon's wild sheep will only rise with a growing human footprint across their range, changes in National, Regional and local wildlife politics, and increasing research and management costs. Each of our wild sheep populations is just one domestic sheep or goat contact away from extirpation. A new farm flock, a poorly managed allotment, a misplaced solar farm or vegetation treatment using domestic sheep or goats, a pack goat lost, and we are starting over.

Thank you for considering our thoughts in the SWAP revision process.

Sincerely,

Kevin Martin
President, OR WSF

CC: CTUIR
CTWS
NPT
WSF

BORISCH Roxann B * ODFW

From: Ann Vileisis <ann@kalmiopsisaudubon.org>
Sent: Thursday, July 17, 2025 3:31 PM
To: OCS Revision * ODFW
Subject: Re: Query about relevance of possible comment letter on serpentine fens

Thanks Carolyn —I think all of these parts still leave the gap for serpentine fens —so I will plan to submit comments.
I appreciate your response.

All best!
Ann

Ann Vileisis
President
Kalmiopsis Audubon Society
P.O. Box 1265
Port Orford, OR 97465

On Jul 17, 2025, at 3:13 PM, OCS Revision * ODFW <OCS.Revision@odfw.oregon.gov> wrote:

Hi Ann,

Thank you for your email.

Fens were included in the 2016 SWAP as their own habitat type under "Fen Peatlands" in the Specialized and Local Habitats section:
https://www.oregonconservationstrategy.org/strategy-habitats/specialized-and-local-habitats/
And they have been retained as Specialized and Local Habitat in the revised 2025 version, available on our revision website:
https://dfw.state.or.us/SWAP-Revision/docs/SWAP%20Key%20Habitats.pdf
Fens are also discussed in several COA profiles.

Serpentine habitats are discussed under "Balds and Bluffs" and "Port Orford Cedar Forests" in Specialized and Local Habitats, and in Grassland Habitats, Late Successional Mixed Conifer Forests, and Wetlands Key Habitats. They are also mentioned in the Klamath Mountain ecoregion, several plant species profiles, and in several COA profiles.

We would welcome any feedback you may have on any of these sections that discuss fens

and serpentine habitats, or on any other sections of the SWAP. Please provide those using the online feedback form available on the revision website (https://dfw.state.or.us/SWAP-Revision/) or over email by July 31st.

Cheers,

Carolyn A. Eckrich
SWAP Revision Coordinator
Oregon Dept. of Fish and Wildlife
Carolyn.A.Eckrich@odfw.oregon.gov

-----Original Message-----
From: Ann Vileisis <ann@kalmiopsisaudubon.org>
Sent: Tuesday, July 15, 2025 10:36 AM
To: OCS Revision * ODFW <OCS.Revision@odfw.oregon.gov>
Subject: Query about relevance of possible comment letter on serpentine fens

[You don't often get email from ann@kalmiopsisaudubon.org. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Hi Carolyn,
I am writing to figure out if it's worth adding a comment into the SNAP public process the hopper regarding some unique habitats we have down here in SWO -serpentine fens. These are groundwater dependent ecosystems with communities of rare plants.

The state was part of a conservation agreement for these ecosystems back in 2006 -and I see that it was not part of a more recent conservation strategy completed by federal agencies in 2018.

The reason I am reaching out is to determine if you already considered this topic, and it no longer fits into your framework. But if, instead, it just fell off the radar, I'd like to submit some comments. It seems like it could be added to that unique habitats part of the plan. (There are other small, distinctive habitats in that list) You may feel they already fall under seeps, springs and headwaters or spring fed streams-but they are really their own interesting habitat.

Also, many but not all of these habitats are on federal land -but given changes these days, I am thinking it might be important to have them listed in state plans too.

I know the plan seems to be focused on wildlife but I am glad to see that it continues to include plants too, as I am a conservation advocate that has leaned on Oregon Conservation Strategy status to advocate for plants, wildlife and habitats -and of course all are connected.

I have been aware of the long process you've been working through and hate to be someone who chimes in at the last minute -but I didn't have time to participate all along.

Please let me know if you think it's worth my sending a comment letter on this topic.

Thanks for your work on this important project of updating Oregon's wildlife action plan!

Ann

Ann Vileisis
President
Kalmiopsis Audubon Society
P.O. Box 1265
Port Orford, OR 97465
541-253-6302

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, July 18, 2025 7:34 AM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#55]

Are you an Oregon resident?	Yes
Email	geologyfan11@yahoo.com • By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.
Please provide your comments on the specific topic(s) in the space below:	Possibly including Oregon Shores Conservation Coalition as a Citizen Science venue for volunteers to monitor Oregon's coastline, under CoastWatch. https://oregonshores.org/programs-campaigns/coastwatch/ Also, Elakha Alliance is a new organization looking for volunteers. https://www.elakhaalliance.org/get-involved/volunteer/

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, July 18, 2025 2:55 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#56]

Are you an Oregon resident?	No
Email	lcarranza@cnlm.org
	• By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.
Please provide your comments on the specific topic(s) in the space below:	It seems as though the Yellow-breasted chat (Icteria virens) and acorn woodpecker (Melanerpes formicivorus) are not SGCN in the draft 2025 SWAP. However, they are both identified on the ODFW Sensitive species list. Acorn woodpecker is identified as Sensitive in KM, WV and Yellow-breasted chat is identified as Sensitive-Critical in KM, WV. Is it your intention to not include these species as a SGCN?

BORISCH Roxann B * ODFW

From: ECKRICH Carolyn A * ODFW
Sent: Monday, July 21, 2025 3:42 PM
To: OCS Revision * ODFW
Subject: FW: ODFW, Conservation Toolbox and Intertwine

From: VANWYK Emily J * ODFW <Emily.J.VANWYK@odfw.oregon.gov>
Sent: Monday, July 21, 2025 3:39 PM
To: Owen Wozniak <owozniak@lta.org>
Cc: tara@theintertwine.org; ECKRICH Carolyn A * ODFW <Carolyn.A.ECKRICH@odfw.oregon.gov>
Subject: RE: ODFW, Conservation Toolbox and Intertwine

Thanks, Owen! I will do my best to integrate comments.

Please see the revised SWAP in its entirety here: https://dfw.state.or.us/SWAP-Revision/

Emily

From: Owen Wozniak <owozniak@lta.org>
Sent: Monday, July 21, 2025 3:11 PM
To: VANWYK Emily J * ODFW <Emily.J.VANWYK@odfw.oregon.gov>
Cc: tara@theintertwine.org
Subject: RE: ODFW, Conservation Toolbox and Intertwine

Emily,

Thank you for your patience in awaiting my response. I appreciate the opportunity to review the draft Conservation Toolkit. Regarding the spotlight sidebar on the Intertwine Alliance, I've drafted a slightly different paragraph for your consideration. I think it better captures the language we use to describe our work.

> "The Intertwine is the greater Portland/Vancouver metropolitan region's network of parks, trails, and natural areas. **The Intertwine Alliance** works to support this system and to help ensure that its benefits flow to every member of our community. With over sixty partners from government agencies, businesses, and nonprofits, the Intertwine Alliance advocates for investments in nature and builds capacity among partners to make these investments more equitable. It facilitates regional collaboration and promotes a collective vision for how nature and people can prosper together. Intertwine Alliance convenings address issues such as equitable access to water, climate adaptation through urban tree equity, the connection between houseless and natural areas, and the role of parks, trails, and natural areas in maintaining livability. Over its nearly two decades, the Alliance has supported and championed partner efforts around parks funding, outdoor education, regional trails, climate adaptation, placemaking, green schoolyards, and more. The Alliance also helped to create and drive implementation of the Regional Conservation Strategy, a regional counterpart to Oregon's State Wildlife Action Plan. The Regional Conservation Strategy identifies opportunities to achieve conservation goals within an urban context and makes

a clear and compelling case for why nature is essential to cities *and* why cities are essential to Oregon's larger conservation goals."

Regarding the Toolkit, I can't technically say I'm speaking for the Intertwine Alliance because we have a Policy Committee and that committee is the proper venue for "official" TIA comments on matters such as this. But I believe I'm speaking in a manner consistent with the Alliance's mission, vision, and priorities in saying the following:

First, Mike Houck's comments on behalf of the Urban Greenspaces Institute (I have a draft dated July 7) also reflect the Intertwine Alliance's perspective. We very much support individual action at all three scales (backyard, neighborhood, and watershed) articulated in the Toolkit; but we also believe that action by local governments in partnership with community-based groups is essential. Probably the most important step urban and suburban residents can take is to familiarize themselves with the policies, resources, and funding needs of their local government agencies (especially parks departments, public utilities, and soil and water conservation districts) and, where appropriate, advocate for robust and equitable investments by these agencies in conservation. These agencies contend with diverse and at times many conflicting priorities; nature-positive action can only be sustained through ongoing engagement by the public. This is how significant conservation wins, such as Metro's successful Parks and Nature bond measures in 1995, 2006, and 2019, have been achieved.

Second, I urge you to include in this section of the Toolkit a statement to the effect that every urban and suburban resident has an opportunity to support holistic conservation by leaning about and framing their actions through a broader lens. The actions that individuals, NGOs, and governments take at the urban and suburban levels to advance core SWAP goals should also support humane, equitable, and appropriate approaches to housing, climate adaptation, neighborhood revitalization, and economic development. The impact of actions taken with this holistic framing may at times be more difficult to identify but will ultimately be more effective and durable. I appreciate the discussion of "The Importance of Diversity in Conservation" (line 240) under the Landscape Conservation section. This points to the need to expand the table of conservation actors. In addition, I am here advocating an expansion of what constitutes conservation action. Working to improve tree codes, stormwater management practices, energy development, zoning codes, and even policing practices all bear on the long-term success of the conservation goals outlined in the SWAP.

I had not yet been able to review the draft SWAP itself but will try to do so before your deadline. I hope these comments are helpful.

Thank you!

Owen Wozniak
Land Transactions Program Manager
Land Trust Alliance
503-460-7045
With your support, we can keep Gaining Ground.
Connect with us on Twitter | LinkedIn | Instagram | Donate

From: VANWYK Emily J * ODFW <Emily.J.VANWYK@odfw.oregon.gov>
Sent: Thursday, July 3, 2025 12:17 PM
To: Owen Wozniak <owozniak@lta.org>
Cc: tara@theintertwine.org
Subject: ODFW, Conservation Toolbox and Intertwine

Hi Owen and Tara –

It was great getting to connect with Owen the other day, and Tara I hope we are able to connect soon. I'm still very interested in updating the language that we have describing the Intertwine alliance within the revised State Wildlife Action Plan. Is this something that the two of you could help me with? We're gearing up to submit a draft to circulate to the public next week, and I'd like to include placeholder language for the Intertwine Alliance. In recognition that I wasn't able to find overlap with Tara, we could also remove this for now.

Here is the current language. In bold is where I think there may be updates following my conversation with Owen on what you'd like to highlight about the Intertwine Alliance, perhaps highlighting too connection to equity, houselessness in natural areas, access to water or resources, or other components of the work you do.

> "The Intertwine Alliance sits at the nexus of community and government for conservation in the greater Portland/Vancouver metropolitan region. It is a coalition of private firms, local governments, public agencies, and nonprofit organizations working together to tap new sources of funding and better leverage existing investments to protect parks, greenspaces, and trails, and connect the local community with the outdoors and nature. As part of The Intertwine Alliance's work to build and support this broad coalition, they have developed forums for stakeholders to come together to help guide the evolution of parks, natural areas, trails, open spaces, and recreation opportunities and to work together on collaborative projects under a shared vision for the region. **The Intertwine Alliance's Regional Conservation Strategy is a detailed description of the natural resource features of the urban landscape, and provides a road map for future conservation efforts on the landscape."**

Thanks for your help!!
E

EVERYONE BELONGS OUTDOORS

Emily VanWyk | Wildlife Diversity Program Coordinator
Oregon Department of Fish and Wildlife
P: (503) 947-6187 | C: (503) 910-7888
4034 Fairview Industrial Drive SE, Salem, OR 97302
Emily.J.VanWyk@odfw.oregon.gov

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, July 25, 2025 10:44 AM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#214]

Are you an Oregon resident?	Yes
Email	kaytata77@gmail.com
	• By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.
Please provide your comments on the specific topic(s) in the space below:	Please that conservation wording must be included in any Wildlife Action Plan or revision of such a plan. It is unacceptable to allow protections of wildlife to be excluded just as environmental protections continue to get excluded by our current administration. What about future generations? This is wrong. Thank you. Tanya Maxwell

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, July 28, 2025 1:45 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#282]

Are you an Oregon resident? Yes

Email mikehouck@urbangreenspaces.org

Please provide your comments on the specific topic(s) in the space below:

I was to see the amount of thought and specific recommendations regarding Climate ADAPTATION. While mitigation (greenhouse gas reduction) is extremely important, too many programs focus almost exclusively on GHG reduction and relatively little, to none on adapting to climate change. I think the report would be enhanced if you provided some on the ground examples. Two I would mention in the urban context is Foster Floodplain on Johnson Creek which is a Portland Bureau of Environmental Services project to reduce flooding and improve floodplain ecological function. The other is at Westmoreland Park in SE Portland where restoration on Crystal Springs Creek created a cold water refugium for salmonids during recent heat domes.

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, July 28, 2025 2:00 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#283]

Are you an Oregon resident? Yes

Email mikehouck@urbangreenspaces.org

Please provide your comments on the specific topic(s) in the space below:

Urban is not included Key Habitats or Special Habitats. It has been a general policy of natural resource agencies, planners, and many nonprofit conservation organizations to "write off" the urban environment when issues of conservation "priority" is concerned. I believe strongly that the diversity of fish and wildlife habitats in, for example, the Portland–Vancouver metropolitan region, warrant special "URBAN" focus in the SWAP. I would argue that urban conservation, both for ecological and education of the general public, should be elevated within ODFW and should be addressed as a habitat of concern.

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, July 28, 2025 2:17 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#284]

Are you an Oregon resident? Yes

Email mikehouck@urbangreenspaces.org

Please provide your comments on the specific topic(s) in the space below:

I was pleased that you called out the fact that Goal 5 is primarily a "process" goal. I was intimately involved in conducting Goal 5 inventories throughout the Portland metropolitan region in the early-to-mid 1980s. My first obstacle was ignorance on the part of local planners. The first county I went to told me "there is no place for nature in the city" and that Goal 5 did not apply in the urban environment. There was great resistance to protecting habitat inside the UGB since that would remove land from the buildable lands inventory. I found there was little appetite on the part of city and county planners to protect urban natural resources. Fortunately, we turned to non-regulatory efforts such as working with public utilities on green infrastructure approaches to addressing requirements under the Clean Water Act along streams and wetlands. Metro's Parks and Nature (Metropolitan Greenspaces Program) which was initiated in the early 1990s has protected over 20,000 acres of natural areas through willing seller acquisitions.dd

I note a HUGE omission in your land use, statewide goals conversation. In the 1990s Metro chose not to focus on Goal 5 when working on its 2040 Growth Managment program and instead focused on Goal 6, water quality and Goal 7 Hazard Lands. Using the combination of those two goals Metro adopted Title 3 which concentrated protection of urban stream corridors for water quality and human health and safety.

It was only later in 2006 that Metro adopted Title 13 which was a Goal 5 effort. Unfortunately, those protections were only applied to the highest scoring stream corridors with upland habitats left with "voluntary" protections.

Finally, there is a continued conundrum regarding Goal 5 and Goal 9 in the urban context. Goal 9 essentially trumps

Goal 5 which is a huge impediment to protecting some of the most important habitat in the urban setting, along our streams and rivers.

Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302

July 22, 2025

Comment Regarding the State Wildlife Action Plan for Otters

I am a citizen of Oregon and I am writing to express my total support to these comments by the Elakha Alliance

I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation.

Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes.

Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea otter recovery.

Reintroduction would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. Oregon historically served as a mixing zone for these two subspecies, and restoring this connectivity would benefit the entire species.

Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence.

Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile.

Thank you!

David Pilz

David Pilz
P.O. Box 876
Corvallis, Oregon 97339

Oregon Zoo
Together for Wildlife

4001 SW Canyon Road
Portland, OR 97221
503.226.1561
oregonzoo.org

July 28, 2025

Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

RE: Recommendation to Include Sea Otter Reintroduction and Sunflower Sea Star Recovery as Conservation Actions in the 2025 State Wildlife Action Plan

Dear Chair Wahl and Commissioners,

On behalf of the Oregon Zoo, I write to urge the inclusion of sea otter (*Enhydra lutris*) reintroduction and sunflower sea star (*Pycnopodia helianthoides*) population augmentation as conservation actions in the revised 2025 Oregon State Wildlife Action Plan (SWAP). As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to take proactive steps that restore ecological function and resilience to our nearshore environments.

We commend the Oregon Department of Fish and Wildlife for newly designating sea otters as a *Species of Greatest Conservation Need* (SGCN) and recognizing kelp and eelgrass beds as key habitats. These acknowledgments are a critical step forward. However, without action-oriented recommendations around reintroduction and population recovery for the benefit of both these species and the habitats with which they are intertwined, the plan risks falling short of its stated purpose.

The Oregon Zoo has seen firsthand the transformative power of reintroduction as a conservation tool. We've helped restore California condors to their historic range, reestablished Oregon silverspot butterflies in coastal grasslands and advanced recovery of native amphibians and northwestern pond turtles through headstarting. We've also long supported the Elakha Alliance's efforts to explore a science-based reintroduction of sea otters to the Oregon coast. More recently, we've joined the Oregon Kelp Alliance (ORKA) and the broader marine conservation community in exploring a pilot outplanting effort to bolster *Pycnopodia* numbers and accelerate their recovery.

Restoring these top predators offers clear and measurable ecological benefits. Sea otters and sunflower sea stars are both keystone species with well-documented roles in controlling sea urchin populations, thereby protecting kelp forests, a key habitat and SGCN in their own right. Kelp forests and eelgrass beds provide nursery grounds vital for commercial fisheries, food webs and carbon sequestration and structural complexity that keep our nearshore ecosystems resilient. Their loss has cascading effects on biodiversity, fisheries and coastal health. Yet the draft SWAP does not currently acknowledge the absence of sea otters or sunflower sea stars as

Oregon Zoo
Together for Wildlife

4001 SW Canyon Road
Portland, OR 97221
503.226.1561
oregonzoo.org

contributing factors to these habitat declines, nor does it recommend their return as part of the solution.

Moreover, Oregon remains the largest unoccupied section of historical sea otter range on the Pacific coast. Without recolonization or reintroduction, the species' long-term resilience remains at risk. Restoring sea otters here would reconnect northern and southern populations, preserve genetic diversity, and buffer the species against catastrophic events in its current fragmented range. According to a 2022 U.S. Fish and Wildlife Service feasibility assessment, reintroducing sea otters would provide significant conservation benefits to the species and to Oregon's nearshore ecosystem.

We respectfully recommend that the final SWAP include the following actions:

- **Re-establish sea otters in Oregon's nearshore and estuarine environments** to support kelp and eelgrass restoration and strengthen climate resilience;
- **Explore augmentation of sunflower sea star populations** through scientifically informed recovery efforts to restore trophic balance and protect critical habitats;
- **Explicitly acknowledge the loss of these predators as a limiting factor** for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy.

We are grateful for the Commission's leadership in advancing wildlife conservation in Oregon. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the species and ecosystems that define Oregon's identity.

Sincerely,

Heidi Rahn

Heidi Rahn
Director, Oregon Zoo
4001 SW Canyon Road
Portland, OR 97221
www.oregonzoo.org Oregon Zoo

BORISCH Roxann B * ODFW

From: OCS Revision * ODFW
Subject: FW: State Wildlife Action Plan Revision Comment Form [#294]

From: Wufoo <no-reply@wufoo.com>
Sent: Tuesday, July 29, 2025 1:21 PM
To: OCS Revision * ODFW <OCS.Revision@ODFW.Oregon.gov>
Subject: State Wildlife Action Plan Revision Comment Form [#294]

Yes

Email lwvor@lwvor.org

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

ODFW: SWAP (State Wildlife Action Plan) PLAN

LWV National Position: The League of Women Voters of the United States believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical and biological integrity of ecosystems and to protect public health.

Same basic strategies for most goals (research, monitor and evaluate, prioritize and implement best practices, partnering)

With so much observed, it would be good if words like 'can', 'may', are changed to 'is' and 'will'. It is tenuously written as if the impacts to our landscape and associated wildlife are not out of balance now.

Much is written about the collaboration with partners as this plan is an incentive for management. It would be good to have more active education on the components in the plan. Perhaps townhall, school, church, neighborhood association presentations/events to get this information into the hands of the voters. (eg. Mid Willamette Aquatic Weed Partnership Event July 2025, funded by Lottery).

487: The single best conservation measure for maintaining wildlife connectivity in the state would be to protect remaining undeveloped habitat. (Yet we are working to reduce permitting procedures for development in part because of the housing crisis).

2024: 'Invasive species' does not include humans, domestic livestock, or non-harmful exotic organisms. (This definition should change to include humans as the greatest invasive species as section 2616 highlights).

2392: Private landowners are increasingly partnering with watershed councils, ODFW, SWCDs, ODA, and federal land management agencies to manage invasive species across property lines. Such broad-scale efforts need to continue and be expanded. (YES)

2428: Web-based information portals are an important tool for invasive data reporting and sharing. iMap Invasives is an online tool that allows users to report invasive species findings, and provides information on invasive species distribution, treatment efforts and effectiveness, and areas where invasive species were searched for but were not found. The Oregon Invasive Species Council also has an online reporting and sharing tool. iNaturalist, a community based online species identification system and occurrence recording tool, is another resource that can enhance verifiable data collection from the public. (These are incredible hands on resources for the public)

With increasing population and economic development, rural landscapes are changing, leading to conflicting uses within and adjacent to fish and wildlife habitat. (and now we are working to reduce permitting process for development)

2831: Technical assistance, such as outreach and education, will be necessary to support local governments and stakeholders to integrate current data. Support and partnerships are necessary, which may involve the creation of toolkits, guidance and training for integrating habitat conservation into development planning and permitting. For example, Oregon would benefit from development of a Green Growth Toolkit (LOVE THIS) to assist communities in implementing conservation actions and proactively planning for growth as development pressures increase.

Submitted by the League of Women Voters of Oregon

BORISCH Roxann B * ODFW

From:	Ann Vileisis <ann@kalmiopsisaudubon.org>
Sent:	Tuesday, July 29, 2025 11:11 PM
To:	OCS Revision * ODFW
Cc:	Barbara Ullian
Subject:	Comments for State Wildlife Action Plan
Attachments:	KAS and FOK comments re SNAP_7.29.2025.pdf

Dear Carolyn,

I am writing to provide comments to the Oregon Conservation Strategy revision/ State Wildlife Action Plan process from Kalmiopsis Audubon Society and Friends of the Kalmiopsis.

Please find our comments attached here.

Don't hesitate to be in touch if you have any questions.

All best,

Ann

Ann Vileisis
President
Kalmiopsis Audubon Society
P.O. Box 1265
Port Orford, OR 97465

July 29, 2025

Carolyn A. Eckrich
SWAP Revision Coordinator
Oregon Dept. of Fish and Wildlife

Re: Comments regarding unique ecosystems in Oregon State Wildlife Action Plan process

Dear Ms. Eckrich:

Greetings! We are writing on behalf of the Kalmiopsis Audubon Society and Friends of Kalmiopsis to provide comments on the revision to Oregon's State Wildlife Action Plan, formerly called the Oregon Conservation Strategy.

We appreciate that you are revising this important plan, and we urge you to add in a rare and unique habitat type from our region that does not seem to be otherwise covered in the plan—Serpentine *Darlingtonia* fens and wetlands. These are truly special and fascinating ecosystems that merit inclusion under the unique habitats or wetland part of the new State Wildlife Action Plan (SNAP).

These groundwater-dependent wetlands are found primarily on the serpentine terrain of the Klamath-Siskiyou Region in southwestern Oregon (and northwestern California. They are characterized by the perennial flow of water in soils that are ultramafic or serpentine in origin, and the presence of the charismatic, insectivorous Cobra Lily or California Pitcher Plant (*Darlingtonia californica*). They are also a source of cold water that feeds our region's streams and rivers and they host a suite of associated rare plants.

To be clear, serpentine fens and wetlands in the Klamath Mountain (KM) ecoregion are distinct from the fen peatlands that are described generally on p. 124/ line 3872. Although they are certainly groundwater dependent, in my experience, they are not always peat-generating in the sense of the word "peatlands." They are also distinct from the other serpentine habitat types described as serpentine barrens (1414/ 3783) under grasslands and balds and bluffs and as serpentine soils (1677/ 4009) under forests. A singular example of a Darlingtonia wetland (2824) is included in the Coast Range ecosystem under wetlands (which also includes salt marshes) –but this is one specific site and does not really express the way that these unique habitats are associated with the KM ecoregion.

To add serpentine fens and wetlands to the SNAP, it would be important to mention them by name. Ideally, it would be good to give them their own subsection. An alternative would be to add a sentence to the fen peatland section such as: "Serpentine fens and wetlands are a unique subset of these groundwater dependent ecosystems." And then add the Klamath Mountains

(KM) ecoregion. Alternatively, for a more concise addition to this section, you might consider just adding -- after the word pumice-- "or serpentine."

It's important to be aware that serpentine wetlands are subject to a 2006 U.S. Fish and Wildlife Service Conservation Agreement (*Conservation Agreement for Hastingsia bracteosa, H. atropurpurea, Gentiana setigera, Epilobium oregaum, and Viola primulafolia ssp. Occidentalis and serpentine Darlingtonia wetlands and fens from Southwestern Oregon and Northwestern California)*[1] to protect five rare plant taxa that were candidates for protection under the Endangered Species Act. It's important to underscore, too, that *H. bracteosa* is an Oregon state listed threatened plant.[2] The state of Oregon's Department of State Lands and Department of Agriculture (which has purview over rare plants) were interested parties to the agreement as was the Oregon Heritage Information Center, which we understand to have been engaged in developing the first Oregon Conservation Strategy. Most of these rare plant populations, but not all, are located on federal National Forest and Bureau of Land Management lands. Most are located in the greater Kalmiopsis Wilderness region –and in the Illinois River basin. These habitats are also the subject of a 2018 *Serpentine Darlingtonia Wetlands* Conservation Strategy that was developed by the federal agencies.[3]

However, with current changes to federal environmental policy and growing risks to these rare ecosystems owing to the threat of surface strip mining, we think it is especially important to highlight the significance of these rare and unique habitats to the State of Oregon in the new plan and also to consider ways that Oregon state laws, policies, and programs could help to conserve them.

We are including in the footnotes to this letter links to the afore mentioned conservation agreement and strategy documents that provide additional substantive background information about the significance of these unique habitats in the Klamath Mountains ecoregion, and we would be happy to provide photos if that would be helpful.

Thank you for considering our input.

Sincerely,

Ann Vileisis, President Kalmiopsis Audubon Society

Barbara Ullian, Friends of the Kalmiopsis

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[1] "Conservation Agreement for *Hastingsia bracteosa, H. atrogurpurea, Gentiana setigera, Epilobium oreganum,* and *Viola primulifolia* ssp. *Occidentalis* and serpentine *Darlingtonia* wetlands and fens from Southwestern Oregon and Northwestern California," https://ecos.fws.gov/docs/plan_documents/ccaa/ccaa_477.pdf

[2] Oregon Dept. of Agriculture, "Large-flowered rush lily (*Hastingsia bracteosa*) Fact Sheet," https://www.oregon.gov/oda/Documents/Publications/PlantConservation/HastingsiaBracteosaProfile.pdf

[3] USDI, Bureau of Land Management and USDA, Forest Service, 2018 "Conservation Strategy for *Epilobium oreganum*, *Gentiana setigera*, *Hastingsia bracteosa* var. *bracteosa*, *H. bracteosa* var. *atropurpurea*, and *Viola primulifolia* ssp. *occidentalis* in Serpentine *Darlingtonia* Wetlands of Southwest Oregon and Northwest California," HTTPS://WWW.FS.USDA.GOV/R6/ISSSSP/DOWNLOADS/XVASCULAR/CS-VA-SERPENTINE-WETLAND-CONSERVATION-STRATEGY-20190418.PDF

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, July 30, 2025 8:01 AM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#625]

Are you an Oregon resident?	Yes
Email	tomsueschraeder@msn.com
	• By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.
Please provide your comments on the specific topic(s) in the space below:	Keep up the great work!

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, July 30, 2025 9:19 AM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#650]

Are you an Oregon resident? Yes

Email sara.hamilton@oregonkelpalliance.com

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

My name is Sara Hamilton and I am the Science Coordinator for the Oregon Kelp Alliance (ORKA). I have reviewed the revised SWAP on behalf of ORKA and applaud the state for including kelp forests as a Specialized and Local Habitat. We are also pleased to see bull kelp, sunflower sea stars, and all three of Oregon's abalone species listed as Species of Greatest Conservation Need.

We are concerned, however, as to how many of the conservation recommendations around kelp and kelp forest species focus only on monitoring and filling data gaps and neglect to list any action-oriented conservation actions. Monitoring and research, in and of themselves, do not advance conservation. It is only when that knowledge and information are combined with action that you can advance conservation. We see this lack of action-oriented conservation recommendations in the "Ecoregions-Nearshore" section, the "Specialized and Local Habitats - Kelp Forests" section, and the Species of Greatest Conservation Listing information for bull kelp, sunflower sea stars, red abalone, pinto abalone, and flat abalone.

Further, the current recommended conservation actions for these species neglect to include projects that Oregon state agencies are currently supporting. For instance, ODFW is currently supporting active kelp restoration work through the Letters of Authorization is has given to ORKA and others to remove sea urchins from three kelp forest restoration sites. Additionally, ORKA is currently piloting bull kelp outplanting and spore enhancement techniques at two sites with permission from the Department of State Lands. Thus the current list of recommended conservation actions does not

acknowledge ongoing work in the state supported by state agencies.

For the "Ecoregions-Nearshore' section, the "Specialized and Local Habitats - Kelp Forests' section, and the Species of Greatest Conservation Listing information for bull kelp, we recommend adding the following conservation actions:
- Pursue active restoration of lost kelp forest habitat at suitable locations using sea urchin population control, kelp outplanting, and kelp spore enhancement.
- Explore options for promoting the restoration of sea urchin predator species in Oregon, including the sunflower sea star.
- Pursue kelp forest preservation by working with commercial, recreational, and Tribal urchin harvesters to direct long term urchin harvest effort at sites with increased purple sea urchin densities.
- Assess the potential for using bull kelp strains with improved heat tolerance for restoration work.
- Assess how to preserve genetic diversity in Oregon's kelp species in the face of ongoing population declines.

For the three listed abalone species, we recommend adding the following conservation actions:
- Support kelp forest restoration and preservation action in areas of high importance to abalone populations to restore abalone food sources.
- Explore the potential for captive breeding and outplanting work in Oregon in coordination with ongoing efforts in California and Washington

For the sunflower sea star, we recommend adding:
- Explore the potential for captive breeding and outplanting work in Oregon in coordination with ongoing efforts in California and Washington.

The additional conservation actions we recommend here align closely with coastwide, national, and global plans for kelp forest species recovery, including The Nature Conservancy's "Roadmap to recovery for the sunflower sea star (Pycnopodia helianthoides) along the west coast of North America", the Kelp Forest Alliances' "A roadmap for protecting and restoring 4 million hectares of kelp forests by 2040", and abalone recovery and management plans for California and Washington (see References).

Overall, given that a stated goal of the SWAP is to "provide a wide range of voluntary conservation tools, to empower local communities and landowners to take advantages of existing opportunities to act", the current recommended conservation actions for these kelp forest species overlook important avenues through which communities could or already acting. Adding the conservation actions we have suggested above will help Oregonians understand the range of

conservation actions available for preserving these species and ecosystems.

Our other recommendation for the revised SWAP is to add other key kelp species to the Species of Greatest Information Need list, including Macrocystis pyrifera, Laminaria setchellii, Pterygophora californica, and Pleurophycus gardneri. Bull kelp is but one kelp species making up the diverse assemblage of kelp species present in Oregon's kelp forests. L. setchellii, P. California, and P. gardneri are common subcanopy kelp species that play a unique role in the kelp forest (Hamilton et al 2024). Spatially, these kelps provide different kinds of habitat from canopy forming kelps due to their position in the water column. Temporally, as perennials their population dynamics contrast from that of Nereocystis luetkeana, which exhibits dramatic changes in population size from year to year. Additionally, M. pyrifera has a very limited range in Oregon and thus the species is at increased risk of local extinction. While the population status of these species is less understood than that of bull kelp, adding these species to the SGIN list will help Oregonians understand that many kelp species contribute to Oregon's vibrant nearshore communities.

We thank you for considering these recommendations and look forward to using the new State Wildlife Action Plan. Please reach out to me if you have further questions (sara.hamilton@oregonkelpalliance.com).

Sincerely,

Sara Hamilton, PhD
Science Coordinator
The Oregon Kelp Alliance

References:

Heady, W. N., and et al. 2022. Roadmap to recovery for the sunflower sea star (Pycnopodia helianthoides) along the west coast of North America. Page 45. The Nature Conservancy, Sacramento, California.

Eger, A., and et al. (2022). A roadmap for protecting and restoring 4 million hectares of kelp forests by 2040. Kelp Forest Alliance, Sydney, Australia.

Recovery Plan for Pinto Abalone (Haliotis Kamtschatkana) in Washington State. 2014.Puget Sound Restoration Fund. https://restorationfund.org/wp-content/uploads/2020/06/2014_Kamtschatkana_Recovery_Plan_clean_Sept2015.pdf

Abalone Recovery and Management Plan. 2005. California Fish and Game Commission. https://wildlife.ca.gov/Conservation/Marine/ARMP

Hamilton, S. L., T. Calvanese, S. A. Gravem, A. W. E. Galloway, D. Chabot, E. Vidusic, and N. Webster. 2024. 2024 Oregon Kelp Forest Status Report. The Oregon Kelp Alliance, Port Orford, OR.

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, July 30, 2025 10:11 AM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#666]

Are you an Oregon resident?	Yes
Email	penwillen@gmail.com
Please provide your comments on the specific topic(s) in the space below:	We keep letting things disappear. Please do not let this happen. We need to see these things in their natural habitats not just zoo's and aquariums.

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, July 30, 2025 11:51 AM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#692]

Are you an Oregon resident?	Yes
Email	oregonways@yahoo.com
Please provide your comments on the specific topic(s) in the space below:	Please continue to protect our ocean and its creatures! ourselves For both our health and the planet. We need more protection not less in these changing times

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, July 30, 2025 12:06 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#696]

Are you an Oregon resident?	Yes
Email	cjblaney46@gmail.com
	• By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.
Please provide your comments on the specific topic(s) in the space below:	It is crucial to the health of our coastlines and seas that we protect sea mammals and manage fisheries. We want to save these stressed populations and promote their wellbeing. Stop actively destroying and over harvesting vulnerable populations and encourage a return to balance. The time to follow science is now. Thank you for doing the right thing and damn you if you don't. Sincerely CJ Blaney

BORISCH Roxann B * ODFW

From: Brett Swift <BSwift@pewtrusts.org>
Sent: Wednesday, July 30, 2025 1:08 PM
To: OCS Revision * ODFW
Subject: OR SWAP - comments
Attachments: Pew letter re ODFW SWAP_7.30.25.pdf

OCS Revision Team –

On behalf of the Pew Charitable Trusts, I have drafted comments on Oregon's State Wildlife Action Plan and attached them for your consideration. Do I need to also submit them via the comment form?

Thanks for consideration of our comments. Please let me know if you have any questions.

Brett

Brett Swift
(pronouns: she/her)
Senior Manager, U.S. Conservation
The Pew Charitable Trusts
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Portland, OR 97201
p: 503.288.9453 | *c:* 971-344-5510
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BORISCH Roxann B * ODFW

From: Brett Swift <BSwift@pewtrusts.org>
Sent: Wednesday, July 30, 2025 1:08 PM
To: OCS Revision * ODFW
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July 31, 2025

Pew

Carolyn A. Erick
SWAP/OCS Revision Coordinator
Oregon Department of Fish & Wildlife

Re: Oregon's Statewide Wildlife Action Plan

Dear Ms. Erich and SWAP/OCS Revision Team,

On behalf of The Pew Charitable Trusts (Pew), please accept these comments on the 2025 Draft Oregon State Wildlife Action Plan (OR SWAP). Pew's U.S. Conservation project advances commonsense solutions that address the impacts of a changing environment on nature and communities, in collaboration with policymakers, Tribes, and stakeholders.[1] The OR SWAP provides a blueprint to proactively conserve Oregon's vast array of flora and fauna. The OR SWAP is comprehensive, well organized, and action oriented, and we commend the Oregon Department of Fish & Wildlife (ODFW) for its continued commitment to the goals stated in the OR SWAP to (1) promote healthy fish and wildlife populations by maintaining and restoring functioning habitats, (2) prevent declines of at-risk species, and (3) reverse declines in these resources where possible.

Pew also supports the comprehensive, adaptive, and collaborative approach envisioned in the OR SWAP, including recognition of the critical role that voluntary actions play in meeting its overarching goals. This approach will facilitate strategic investments of limited time and resources into fish and wildlife conservation. In addition, integration of the Oregon Nearshore Strategy within a single SWAP ensures greater coordination among agencies that work across different landscapes and will result in more strategic allocation of resources.

Our review and specific feedback are limited to the Key Conservation Issues document and our detailed comments, organized by section, are below.

BARRIERS TO ANIMAL MOVEMENT

Pew is encouraged by the importance placed in the OR SWAP on maintaining and restoring both terrestrial and aquatic connectivity, as well as the recognition that ensuring habitat connectivity is a primary management strategy to maintain species and ecosystem services under a changing climate. We strongly support all of the aquatic and terrestrial goals and actions.

Aquatic Connectivity

Action 1.1. Continue work with the OWEB, ODOT, ODF, OWRD, USFS, BLM, counties, local municipalities, irrigation districts, tribes, and other partners to inventory, prioritize, and provide fish passage at artificial obstructions, enhancing current work done by the ODFW Fish Passage Task Force to expand implementation of fish passage priorities.

As noted in the document, as of 2015, there are approximately 27,800 documented fish passage artificial

[1] Pew's U.S. conservation project advances plans and policies that account for the impacts of ongoing climate change while building a stronger and more adaptable environment for people and nature. Website: https://www.pew.org/en/projects/us-conservation.

obstructions in Oregon. ODFW established the 2025 Statewide Priority Fish Passage Barrier list that identifies the most critical barriers, containing over 600 high priority barriers. We recommend that ODFW work with other entities to develop and prioritize a watershed-based approach to fish passage barrier removals. The approach could be something akin to the Salmon SuperHwy[2] in Northeast Oregon which is an unprecedented community effort that prioritized fish passage barriers to remove or modify throughout the watershed.

Action 1.3. When planning aquatic passage projects, consider the needs of other aquatic species and terrestrial wildlife in addition to fish.

Pew strongly supports the consideration and intentional integration of other benefits beyond the primary goal of improving aquatic connectivity when planning aquatic fish passage projects. Although not required in law, designing projects with consideration terrestrial connectivity and flood control, among others, will facilitate attainment of the overarching fish and wildlife goals and contribute to climate resilience. In addition to considering terrestrial connectivity, Pew recommends that ODFW include consideration of flood resilience and modified flow regimes due to a changing climate. The thoughtful design of culverts, Bridges, and other infrastructure to facilitate the passage of terrestrial and aquatic organisms can also accommodate changing flow regimes and increased flooding, benefiting both the built and natural environments.

Terrestrial Animal Movement

Action 2.3. Work with ODOT, counties, cities, and other partners to identify and address key areas of wildlife mortality on roadways and consider animal movements when planning for new roads or modifications to existing roads.

As the OR SWAP acknowledges, wildlife connectivity - the ability for animals to move across landscapes - is crucial for species to adapt to climate impacts by finding new food sources, suitable habitats, and breeding grounds. Wildlife-friendly transportation infrastructure contributes to ecosystems' resilience to climate change. We recommend including information related to the recently passed state legislation HB 2978. The law is an important step forward in reducing wildlife-vehicle collisions on Oregon's roads. It strengthens the Oregon Department of Transportation's (ODOT) wildlife-vehicle collision program while increasing critical coordination between ODOT and ODFW. HB 2978 will build on the state legislature's previous investments in wildlife crossings in 2022 and 2023 by bolstering technical guidance for integrating wildlife crossing features into highway projects, increasing expertise of agency staff regarding wildlife crossings through creation of a training program, identifying priority wildlife crossing projects, and increasing collaboration between ODOT, ODFW, and interested stakeholders through the creation of an advisory group.

In addition to addressing animal movements when planning for new roads or modifications to existing roads, we recommend that ODFW work with ODOT and other entities to proactively explore the construction of wildlife crossing infrastructure in areas identified as high priority in the Priority Wildlife Connectivity Areas.

CLIMATE CHANGE

Pew appreciates the comprehensive discussion of global and Pacific Northwest climate impacts and threats

[2] https://www.salmonsuperhwy.org/

included in the OR SWAP. Pew's U.S. conservation project advances plans and policies that account for the impacts of ongoing climate change, while building a stronger and more adaptable environment for people and nature. Understanding the suite of impacts to species and their habitats is essential to identifying actions that will contribute to climate resilience. The OR SWAP acknowledges the essential nature of planning to respond to climate impacts and throughout the document includes actions related to understanding impacts and ongoing monitoring. We recommend that the OR SWAP identify and incorporate key components of climate-ready natural resource management, with consideration given to Pew's white paper on 5 principles for climate-ready management.[3] In sum they include: (1) climate impact evaluations, (2) establishment of climate responsive goals and strategies, (3) systematic monitoring, (4) adaptive management, and (5) collaborative planning with Indigenous and other climate vulnerable communities.

Climate planning is essential across all landscapes, as noted in the OR SWAP, including in estuaries which will be impacted by sea-level rise, which will increase under all future climate scenarios. Moreover, estuaries—areas where rivers meet the sea—are among Oregon' most valuable natural resources. The seagrass meadows, salt marshes, and forested tidal wetlands that thrive in healthy estuaries provide food and shelter for salmon, Dungeness crab, and other species that support commercial and recreational fishing and Tribal Nations; sustain seabirds and marine wildlife that are important for tourism; capture and store greenhouse gases; ease the local effects of ocean acidification; and protect coastal communities from sea-level rise, storms, and flooding. We urge ODFW to ensure that development of climate-ready estuary management plans.

WATER QUALITY AND QUANTITY

Throughout Oregon, rivers sustain communities by providing clean drinking water, culturally significant areas, and places to fish, hunt, and enjoy other outdoor recreation. Clean water is fundamental to Oregonians' well-being—from growing our food to the drinking water in our homes—and is also critical to the health of nature.

As the OR SWAP notes, warming has been observed in freshwater ecosystems, with warming trends in stream temperatures throughout the Pacific Northwest.[4] Further, the document also states that a strategy for addressing climate impacts may include identifying and protecting cold water rearing and refugia habitat for aquatic species.[5]

Oregon's Existing Framework for Water Quality

The OR SWAP identifies several programs that the state administers to manage water quality, including the development of water quality standards by the Oregon Department of Environmental Quality (ODEQ). A key component of water quality standards are anti-degradation provisions, including Outstanding Resource Waters (ORWs). Pursuant to the Clean Water Act of 1972, Oregon can designate freshwater ecosystems as ORWs for a variety of reasons, including high water quality, exceptional recreational or ecological significance, or the existence of cold-water thermal refuges.

ORW designations preserve the high-quality waters of rivers, lakes, and wetlands, which provide clean

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[3] The Pew Charitable Trusts - U.S. Conservation project, 2024. Climate Ready Management Plans (CRMP): Principles and Key Elements of Managing Natural Resources in the Face of Climate Change (white paper). https://drive.google.com/file/d/1UuD7Kkntone5fuuR8AxcM2EgtXC5ZYHA/view?usp=sharing

[4] OR SWAP, p. 24.

[5] OR SWAP, p. 35.

drinking water for our communities, habitat for wildlife, and also support recreational activities that include fishing, swimming, and paddling. This designation safeguards our freshwater resources from future harm, including pollution from development, mining, and other activities that may threaten clean water.

ORWs can be used to protect freshwater ecosystems throughout the state that are essential to address the impacts of climate change. We recommend that the OR SWAP add information related to ORWs, identify them as a key tool to protect species and habitats, and call for ODFW and ODEQ to coordinate to prioritize candidates for designation as ORWs, including areas that will provide cold water refugia for aquatic species.

Water Quality: Goals and Actions

In this section, we recommend the addition of Action 1.5 that calls for ODFW to work with ODEQ and other entities to identify key cold water refugia for protection as ORWs.

Thank you for the opportunity to provide comments. We appreciate ODFW's efforts to update the OR SWAP to guide the state's next ten years of conservation and management of fish and wildlife. Pew looks forward to continuing collaboration with ODFW and other state agencies to address important conservation needs and working together to protect biodiversity and increase ecosystem resilience for the benefit of people and nature.

Regards,

Brett Swift

Brett Swift
Senior Manager, US Conservation
The Pew Charitable Trusts

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Wednesday, July 30, 2025 2:53 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#742]

Are you an Oregon resident?	Yes
Email	mountaintricia@yahoo.com
Please provide your comments on the specific topic(s) in the space below:	Please protect marine mammals!

BORISCH Roxann B * ODFW

From: Sristi Kamal <kamal@westernlaw.org>
Sent: Thursday, July 31, 2025 11:29 AM
To: OCS Revision * ODFW; ECKRICH Carolyn A * ODFW
Subject: OWC comment letter on SWAP revision draft
Attachments: OWC Comments_SWAP Revision.pdf

Hi Carolyn and the Revision Team

Thank you for the opportunity to submit comments on the SWAP revision draft. Please find attached a comment letter that I am submitting on behalf of the Oregon Wildlife Coalition. For any follow up questions or additional clarification, please feel free to reach out to me or any of the coalition members mentioned in the letter.

Best

Sristi

Western Environmental Law Center

Sristi Kamal, Ph.D.
Deputy Director
Ph: 541-485-2471, ext. 112 ; cell: 971-808-0775
kamal@westernlaw.org
www.westernlaw.org

*** Work-life balance is unique to every individual. I am sending this email at a time that is convenient for me. Please respond at a time that is convenient for you ***

Carolyn A. Eckrich
SWAP Revision Coordinator
Oregon Dept. of Fish and Wildlife
Carolyn.A.Eckrich@odfw.oregon.gov

July 31, 2025

Dear Carolyn and the SWAP Revision Team,

Thank you for the opportunity to submit comments on the draft Oregon State Wildlife Action Plan (SWAP). These comments are submitted on behalf of the members of the Oregon Wildlife Coalition (OWC), which includes Bird Alliance of Oregon, Cascadia Wildlands, Defenders of Wildlife, Humane World for Animals, Humane Voters Oregon, Oregon Wild, Think Wild, and Western Environmental Law Center.

Wildlife and their habitats play an essential role in both the economic and ecological resilience of communities throughout the Western United States. Their presence enhances ecosystems and ecosystem services, especially as climate change continues to alter the world around us, thus making conservation uniquely important in Oregon. In addition to the federal Endangered Species Act, state wildlife actions plans serve as a crucial blueprint for the recovery of species and habitats with the greatest conservation needs. For these reasons, the OWC prioritizes both the planning and implementation phases of the draft SWAP.

Comments Overview:

Overall, the OWC appreciates the mapping improvements from the 2006 Plan, which makes this plan more robust and comprehensive. The draft SWAP provides a comprehensive description of Oregon's fish and wildlife, their habitats, and the challenges they face. We particularly commend the thoughtful inclusion of historically

underrepresented and underserved communities throughout the plan. Although the draft SWAP explicitly states it "is not an ODFW management plan," we believe ODFW should assume a leadership role when possible for coordination of conservation efforts identified in the plan.

While we appreciated ODFW's extended technical review process, unfortunately this occurred during a busy legislative session. Consequently, the public review period was brief—less than 30 days—for an 800+ page document. We understand requirements and constraints associated with federal review deadlines, however, the short timeline limited the OWC's, and the public's, ability to conduct a thorough review. Additionally, while the draft SWAP effectively identifies general conservation strategies that *could* be implemented, it lacks specific measurable actions, particularly regarding ODFW's role (e.g., responding to permit applications and/or implementation of its habitat mitigation rules). Although we recognize the draft SWAP's emphasis on voluntary and cooperative actions, we believe increased regulatory action or enforcement may be necessary to effectively address some wildlife conservation issues.

The remaining detailed comments in this letter are structured according to the sections of the draft SWAP:

a. Key Conservation Issues

The draft SWAP Key Conservation Issues (KCIs) section identifies seven cross-cutting, landscape-scale threats: Barriers to Animal Movement; Climate Change; Disruption of Disturbance Regimes; Invasive Species; Land Use Changes; Pollution; Water Quality & Quantity.

We appreciate/support:

- This section provides a thorough and comprehensive discussion of many key problems faced by Oregon's fish and wildlife. The draft SWAP explicitly positions the KCI overview as "starting points" to guide agencies, partners, landowners, and the public in charting conservation action over the coming decade, not as exhaustive technical syntheses. We agree that the issues are intertwined and often compounding (with climate as a "threat multiplier"), signaling the need for integrated, cross-sector responses.
- The emphasis on high-level cross-jurisdictional collaboration, new conservation tools, and integration with statewide frameworks (e.g., Climate Adaptation Framework; Integrated Water Resources Strategy) are called out up front as broad actions applicable across all KCIs. The most recent U.S. National Climate

Assessment (NCA5) similarly emphasizes compounding, cascading, and cross-regional climate risks that require integrated adaptation strategies and intergovernmental coordination—approaches the draft SWAP signals as necessary.

- The draft SWAP repeatedly advances habitat connectivity as a core adaptation strategy, consistent with global guidance on maintaining ecological networks and corridors to support species movement under climate change.
    - The draft SWAP includes action items to promote permeability in agricultural areas, urban areas, and at energy projects, as well as highway crossings.
    - Incorporating wildlife passage in designs for legally required fish passage is a promising idea.
- The draft SWAP Climate Change section is well positioned to ingest ongoing science using a Climate section's partnership model with active research entities (OCCRI, NW CASC, NOAA, UW CIG) positions the SWAP to ingest ongoing science.

Critique (major gaps, inconsistencies or improvements):

- Calls to "inventory" and "prioritize" (e.g., fish passage Action 1.1) do not specify criteria (ecological benefit, climate resilience, social equity, cost effectiveness, risk reduction). Adopting multi-criteria decision analysis integrating biodiversity value, climate refugia, cultural resources, and community vulnerability would add value to how priorities are determined in managing tradeoffs and co-benefits.
- Implementation is acknowledged as contingent on funding, statutory authority, and alignment with existing plans. While we understand this contingency, it minimizes the overall value of the draft SWAP and underscores the importance of proactive community engagement by the agency to secure legislative support for the plan.
- In the Animal Movement section, road-stream crossing structures should specifically mention underpasses, and in the aquatic passage section, amphibians, invertebrates and reptiles should be mentioned earlier in the section along with fish concerns, as they are only briefly discussed at the end.
- The KCI section references "agencies and partners" broadly but does not explicitly articulate pathways for integrating Tribal knowledge systems. Co-developing vulnerability assessments, monitoring, and adaptation priorities with Tribes, including culturally important species/habitats and Indigenous land management practices in KCI strategies would be significantly valuable.
- Pollution KCI goals call for determining vulnerability and mitigation strategies but offer little current contaminant trend data or monitoring baselines.

    - Water quality & quantity goals similarly lack statewide condition metrics, though they point to broad protection/restoration aims.
    - Equity is implied (helping landowners, informing Oregonians) but not operationalized with indicators.
    - Legacy citations (1990s) persist in some species/habitat sections which can be updated with more current science.
- Pg. 59: In the invasive species section, emerging pathogens such as Batrachochytrium salamandrivorans and Batrachochytrium dendrobatidis should be listed under aquatic invasives as they constitute major threats across numerous threatened amphibian species.
- Pg. 60: Wildfire management activities also contribute to the spread of invasives through application of water from non-local sources.
- Pg. 117: In the water quality and quantity section, Oregon's DEQ is referenced for its responsibility on developing water quality standards and monitoring impaired waterways, but it should be noted that DEQ does not have the capacity to issue TMDL's for every impaired waterway, leaving numerous vulnerable rivers and streams without a restoration plan.
- Climate action items should include incorporating climate change forecasts in regulatory analysis of future impacts of proposed actions.
- KCIs should include more discussion, possibly in separate actions, on management of human-wildlife conflict (e.g., lethal v. nonlethal strategies), and illegal killing of wildlife (e.g., poaching).

b. Ecoregions

We appreciate/support:

- OWC appreciates the overall framing of climate change impacts and supports the recommended approaches to urbanization, land use planning, water quality, and invasive species across the ecoregions. The identification of ecoregion-specific ecological characteristics provides useful context, and the inclusion of regional conservation strategies is important to provide for actionable strategies.
- Specific regional emphasis is important to target actions. For example, the emphasis on wildlife movement corridors and habitat connectivity is especially important in the Coast Range, Klamath, Columbia Plateau and other regions with identified connectivity concerns. In the East Cascades, we strongly agree with the recommendations related to water quality compliance, pesticide use, and implementation of water-smart practices that benefit species such as the Oregon spotted frog. The Klamath Mountains section accurately identifies fire regime shifts

and includes thoughtful recommendations for reintroducing fire and applying adaptive management to restoration and fuel reduction.

Critique (major gaps, inconsistencies or improvements):

- In several regions, there is a disconnect between the identified limiting factors and the recommended actions. Actions should more directly address the stated threats. For example:
    - Blue Mountains: While unsustainable grazing is correctly identified as a significant issue, the chapter lacks actionable strategies related to federal lands, where much of the problematic grazing occurs. It is not sufficient to focus on private land tools (e.g., easements, financial incentives) without also addressing federal grazing allotments and engaging with federal land managers.
    - Coast Range: Industrial logging is noted as a limiting factor for connectivity, yet the recommendations do not include engagement with industrial forest managers. There should be targeted strategies for improving habitat connectivity and quality in this heavily logged region, particularly for forest-dependent species.
    - Klamath Mountains: While we agree with the use of fire and adaptive management, the plan should include specific recommendations to avoid high-quality habitat during fuels reduction activities. Identifying and protecting potential refugia is critical to maintaining biodiversity in this region.
- While some regions mention adaptive management, there is a general lack of detail on how monitoring data will be used to inform ongoing strategy adjustments. Moreover, across multiple ecoregions, there is a notable lack of attention to federal land management practices. The draft SWAP should more explicitly address how state agencies will coordinate with federal partners to improve outcomes on lands where many species of greatest conservation need (SGCN) occur.

c. Key Habitats

Critique (major gaps, inconsistencies, or improvements):

- Pg. 28: In the estuaries section, a recommended approach under "Limiting Factors: Management and Planning Needs" should include a goal to update estuary management plans for all estuaries. Most existing plans are outdated (written in the 1980s)

- Pg. 30 in "Resources for more Information" section: Include Yaquina Bay Estuary Management Plan Update (https://www.yaquina-emp.org/).
- Pg. 26, ln 670 under recommended approach on for "land use conversion": include "do not expand Urban Growth Boundaries".
- Pg 55: the discussion on the Northwest Forest Plan may need to be adjusted as the plan is being amended and the Record of Decision is expected to be completed in the spring 2026.
- Pg. 100: Add Harney Basin Wetland Collaborative to Resources for more information (https://harneywetlandscollaborative.org/).
- Pg. 114: Black Oystercatchers do not nest in colonies. We recommend changing to Common Murre or another colonial nesting seabird. There is also a typo: "net" should be "nest".
- Pg. 115: There is no mention of the updated Rocky Habitat Management Strategy and the 3 types of rocky habitat designated areas: Marine Garden, Marine Research Area, and Marine Conservation Area. We recommend providing a clear indication of where these 20+ sites are located including a map depicting them. The Rocky Habitat Management Strategy can be found at https://www.oregon.gov/lcd/OCMP/Documents/RockyHabitatManagementStrategy_PublishVersion.pdf. A story map of the 8 new rocky habitat sites can be found at https://storymaps.arcgis.com/stories/08020300a89e403e8321fd9220cc4514.
- Pg. 116: We recommend including dog walking and recreational drone use. Both recreational activities create major disturbances for nesting birds and other wildlife.
- Pg. 116: Under Recommended Approach for the nearshore habitats - a limiting factor that needs to be included is "Human Related Disturbances". It's not just "public awareness" that's a limiting factor but it's also creating best management practices to minimize disturbance, exploring new rules or better enforcing existing rules around off-leash dogs, drone use, and fireworks. These are all major disturbance factors for nesting birds and other wildlife.
- Pg. 119: Under "recommended approach" for the Limiting Factors: land use changes (marine spatial planning) specifically call out engaging with the Ocean Policy Advisory Council as an important way to participate in marine planning processes.
- Pg. 129: Seek input from Oregon Kelp Alliance (ORKA) to further develop this section. ORKA deploys techniques such as urchin culling which is not currently listed under conservation actions in the draft SWAP (https://www.oregonkelp.com/).
- Pg. 131: The Rocky Shores section is already covered above in the "Rocky Shore" section on pg. 112 (starting on ln 3412). We recommend combining them.

d. SGCN (and SGIN) Species Comments

We appreciate/support:

- The science-based process used to update Oregon's SGCN list. The effort by ODFW and partners to expand inclusion across taxa and apply consistent criteria reflects a strong conservation planning process. We support the addition of species such as the North American porcupine (*Erethizon dorsatum*), American pika (*Ochotona princeps*). These species are not federally listed but are showing concerning signs of decline in Oregon and elsewhere. Including such species allows for proactive management before declines become irreversible, and positions Oregon as a leader in forward-looking wildlife conservation. We also appreciate the inclusion of sea otters (*Enhydra lutris*) and California condors (*Gymnogyps californianus*) as SGCN. These are two previously extirpated species that have historical ranges in Oregon.
- Pg. 22: Disease is a significant threat to Oregon's fish and wildlife populations and the draft SWAP includes a robust section on diseases and potential management approaches. Naturally occurring and introduced pathogens—including those exacerbated by climate change, habitat loss, and human activity— have serious consequences for animal populations, ecosystem health, and public well-being. Preventative measures, early detection, and coordinated response are essential to manage risk.

Critique (major gaps, inconsistencies, or improvements):

- Pg. 10: Both Canada lynx (*Lynx canadensis*) and grizzly bear (*Ursus arctos horribilis*) clearly meet the SGCN eligibility criteria as native species facing significant conservation concerns. While they are not currently found in Oregon, their historical presence, potential for future recolonization, and the threats they face merit inclusion in the draft SWAP[1][2]. Excluding them ignores the role Oregon should play in regional species recovery.
- Evening Grosbeak (*Coccothraustes vespertinus*) should be strongly considered for designation as an SGCN. An OSU study estimates a 2.6% average annual decline

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[1] Carroll, C., Noss, R. F., Schumaker, N. H., & Paquet, P. C. 2001. Is the return of the wolf, wolverine, and grizzly bear to Oregon and California biologically feasible. *Large mammal restoration: ecological and social challenges in the 21st century. Island Press, Washington, DC, USA*, 25-46.

[2] McKelvey, K.S., 1999. History and distribution of lynx in the contiguous United States [Chapter 8]. *In: Ruggiero, Leonard F.; Aubry, Keith B.; Buskirk, Steven W.; Koehler, Gary M.; Krebs, Charles J.; McKelvey, Kevin S.; Squires, John R. Ecology and conservation of lynx in the United States. Gen. Tech. Rep. RMRS-GTR-30WWW. Fort Collins, CO: US Department of Agriculture, Forest Service, Rocky Mountain Research Station. p. 207-264.*, *30*, pp.207-264.

in Corvallis[3]. Nationally the species has experienced a 78% decline in the past 40 years (BBS data). Bird Alliance of Oregon has documented a negative trend in Portland area sightings during the Christmas Bird Count from 1938-2017 with no irruptive years documented since the 1980s. At a minimum Evening Grosbeak should be included as an SGIN species.

- Vaux's Swift (*Chaetura vauxi*) should remain an SGCN species. There is no justification provided for downgrading to SGIN. The BBS estimated population trend in Oregon for this species continues to be significantly negative since 2000. The Bird Alliance of Oregon (2024) documented roost abandonment at the Chapman Elementary chimney which has long been a key roost on the flyway (hosting as many as 12,000 birds on a single night). While they appear to have shifted to nearby chimneys, overall numbers have trended downwards in the Portland Metro region.
- Boreal Owl (*Aegolius funereus*) should be considered as an SGIN species. Little is known about them in Oregon but they are thought to be permanent residents. Climate change models predict they could be highly impacted, especially in the southern portion of their range (https://climate2014.audubon.org/birds/borowl/boreal-owl).
- Rufous Hummingbird (*Selasphorus rufus*) should be upgraded from SGIN to SGCN. This species is on a precipitous decline in Oregon (4% annual decline from 1966-2022 - BBS data). National Audubon climate models put Rufous Hummingbird as highly vulnerable in their 3C increase scenario by 2080.
- Green-tailed Towhee (*Pipilo chlorurus*) should be considered for SGIN designation as their BBS population trend is significantly declining in Oregon and little is known about this species.
- Tricolored Blackbird (*Agelaius tricolor)* should be considered for SGIN designation as their BBS population trend indicates an overall decline of 83% between 1968 and 2023. While Oregon is home to a relatively small percentage of the known breeding population little appears to be known about their distribution and abundance in Oregon.
- Pg. 14: The draft SWAP does not feature late-successional and old-growth (LSOG) forests in the "animal concentrations" section. This habitat type supports several obligate and associated species that are at risk or listed under the Endangered Species Act. Those include Coastal marten (*Martes caurina humboldtensis*), Pacific fisher (*Pekania pennanti*), Marbled murrelet (*Brachyramphus marmoratus*), Northern spotted owl (*Strix occidentalis caurina*), Sierra Nevada red fox (*Vulpes vulpes necator*), and salmonids (*Oncorhynchus spp.*). The draft SWAP also has

[3] Robinson, W.D., J. Greer, J. Masseloux, T.A. Hallman, and J.R. Curtis. 2022. Dramatic declines of evening grossbeak numbers at a spring migration stop-over site. Diversity 14: 496 https://doi.org/10.3390/d14060496

no mention of Humboldt's Flying Squirrel (*Glaucomys oregonensis*). This species and the Northern Flying Squirrel are key indicators of LSOG. The draft SWAP should include this habitat in the animal concentrations.

- The draft SWAP does not include recommended Conservation Actions for sea otters (*Enhydra lutris*). This is a missed opportunity to strengthen coastal ecosystems and advance sea otter reintroduction. Reintroduction would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. Given the best available science and the success of previous efforts, reintroduction should be included as a priority Conservation Action in the updated sea otter species profile.
- The draft SWAP does not include adequate consideration toward mitigating the impacts of trapping, snaring, and hounding on SGCN species. Recreational trapping and snaring of species such as coyote and badger is open statewide and year-round, risking nontarget capture of SGCN species including Pacific marten (*Martes caurina*), Sierra Nevada red fox (*Vulpes vulpes necator*), kit fox (*Vulpes macrotis)*, Pacific fisher (*Pekania pennanti*), gray wolf (*Canis lupus*), ringtail (*Bassariscus astutus*), and wolverine (*Gulo gulo*). Despite the lack of data on Pacific marten ecology outside of the Blue Mountains, legal recreational trapping of Pacific marten is currently allowed east of Interstate 5 annually from November 1 to January 31 with no bag limit. Additionally, Oregon allows hunters to use dogs to hunt or pursue red fox, gray fox, bobcat, raccoon, and unprotected mammals, and the "pursuit season" lasts six months out of the year. Loose packs of hunting dogs encounter and chase all kinds of wildlife, likely including SGCN species which may be injured, killed, or severely stressed by hounds. Hounding activities also disturb other nearby sensitive wildlife species.
- Pg. 21: ODFW should consider providing a linked list of licensed Oregon Wildlife Rehabilitators.

e. Monitoring

<u>*Critique (major gaps, inconsistencies, or improvements)*</u>:

A key benefit of Community Science, in addition to data collection to help inform conservation and management of species and habitats, is cultivating stewardship and local people that can help build support for wildlife protections. We recommend inclusion of this additional benefit of Community Science in this section (starting on ln 133).

f. Conservation Toolbox

We appreciate/support:
We appreciate the recognition of Environmental Justice as a key piece of conservation efforts.

Critique (major gaps, inconsistencies, or improvements):

- In addition to the sections on "Urban Conservation" and "Rural Conservation" (lns 201 and 215), we recommend including an additional section "Protected Area Conservation" including wilderness areas, national wildlife refuges, state parks, national monuments, national parks, marine reserves, etc., to include all regions of Oregon where no development and no/limited natural resource extraction can take place but where recreation is encouraged. We recommend calling out these places and recognizing opportunities for creating additional areas with stronger wildlife/habitat protections as well as creating connectivity between these core areas. While we appreciate the emphasis on "working lands" in the Rural Conservation section, we recommend that the draft SWAP include Oregon's existing protected places. Quantifying the percentage of protected areas in the state would provide a resource for groups interested in moving forward with a 30x30 initiative such as California's (https://www.californianature.ca.gov/).
- Pg. 12: Please link to Forestry for the Birds in Western Oregon by the Forest Stewards Guild in section "Creating backyard habitat": https://foreststewardsguild.org/forestry-for-the-birds-in-western-oregon/ .
- Pg 13: Please link to Bird Alliance of Oregon's Lights Out program in the section "Reducing light pollution": https://birdallianceoregon.org/our-work/protect/habitat-and-wildlife/urban/reducing-wildlife-hazards/bird-safe-building/lights-out/.
- Pg. 14: Please link to Bird Alliance of Oregon's Bird-Safe Buildings program which contains resources for homeowners and professionals (developers/architects) for minimizing window collisions:https://birdallianceoregon.org/our-work/protect/habitat-and-wildlife/urban/reducing-wildlife-hazards/bird-safe-building/.
- Pg. 14-15: Please link to Bird Alliance of Oregon's Cat Safe at Home campaign webpage:https://birdallianceoregon.org/our-work/protect/habitat-and-wildlife/urban/cats-safe-at-home-campaign/.
- We recommend combining sections "Actions by Urban and Suburban Oregonians" and "Actions by Rural Oregonians" to avoid redundancy. We recommend creating a section for actions all Oregonians can take with respect to cats, reducing window collisions, etc., with separate sections specific to urban, suburban, and rural communities.

- Pg. 21: We recommend adding a link to the Natural and Working Lands Grant opportunity: https://www.oregon.gov/oweb/grants/pages/nwl.aspx.
- Pg. 22: "efficient irrigation" (i.e., pivot irrigation) is not beneficial for all wildlife nor for groundwater and hydrologic connectivity. Flood irrigation in Harney County has proven to be a win-win for migratory birds and ranchers. Flood irrigation is not efficient in terms of water conservation compared to pivots but provides much greater wildlife support. Instead of "efficient irrigation," we recommend using "wildlife-friendly irrigation".
- Pg. 26: We recommend providing one of the Xerces examples but then including another example to show diversity in Oregon BioBlitz efforts. We recommend including: https://www.oregonmetro.gov/news/oh-snap-learning-how-bioblitz.
- Pg. 32: We recommend including a coastal outreach example. Tidepool Ambassador programs run by several coastal groups could be featured: https://friendsofotterrock.org/programs/
- We recommend the inclusion of coyotes:
    - There is no mention anywhere of coyotes despite frequent presence in urban wildlife considerations.
    - In Community Science Section: We recommend adding Coyote Crew as a good example of community outreach and coexistence work between ODFW and partners.
    - We recommend including the Portland Coyote Project: https://www.portlandcoyote.com/.
- Pg. 8: There is no mention of urban wetlands. We recommend including urban wetlands along with other habitat types, particularly in relation to managing floodplains.
- Pg. 13: in the collecting rainwater section: We recommend including that it is legal to collect rainwater in Oregon, as it is not in some states, but may require permits.
- Pg. 24: While solar energy facilities and wind turbines are listed as possible disrupters to wildlife connectivity, it is worth adding that they are necessary pieces of adapting to a changing climate and rising energy needs, and have the capacity to be modified for better wildlife movement and to reduce impacts on habitat and rural communities.
- Pg. 26: We recommend noting that community science is both a good opportunity to collect data and crucial to filing otherwise unaddressed gaps in information for the agency, particularly for non-game species.
- Pgs. 31-32: We recommend including partnering with recreation businesses, not just agencies and nonprofits.
- Pg. 32: We recommend further developing communications and education actions. These should include describing the partners involved, timelines, and the process for distributing materials to new audiences.

- We recommend inclusion, for all areas, of strategies for living with wildlife, including the use of nonlethal strategies to address human-wildlife conflict. Strategies should also be included in communication/outreach plans.

Appendix: Nearshore

- We recommend that the list on the SGCN section conform with the list in this appendix. Currently, the species are ordered differently in each section.
- Pg. 50: We recommend including a description of the current status of the floating offshore wind process. Oregon is developing an "offshore wind roadmap" document that should be completed in 2026. Although it is unclear of the future of offshore wind development in Oregon, if it does move forward it will be the largest offshore development Oregon has ever seen and would likely have a major influence on some draft SWAP habitats and species as significant offshore wind infrastructure and related boat traffic would occur in state waters (even though turbines would be in federal waters).
- Pg. 60: We recommend including information on the mandate for these protected areas as guided by the original designation bill (SB 1510) as well as the recent bill (HB 4132) which mandates many of the recommendations from the OSU decadal review of ODFW's Marine Reserve Program.
- Pg. 63 in "Habitat Data" section: We recommend including that a full rocky habitat inventory needs to be completed, including biotic and human uses, as the last one was completed over 30 years ago and is out of date. This is needed to inform rocky habitat management as well as designation, removal, and amending new rocky habitat sites (see Territorial Sea Plan Ch. 3).
- Pg. 64: We recommend further developing the detail in this section similar to the detail provided in ecosystem data and oceanographic data sections. ODFW's Marine Reserve program has done extensive Human Dimensions studies for over 10 years and we recommend discussion and next steps in such engagement. A discussion with Marine Reserves Program staff at ODFW would help inform this section.

Appendix: American Beaver Spotlight

In this iteration of the draft SWAP, American Beaver is not a SGCN, nor is beaver modified habitats listed as key habitats. We understand that the key habitats category is based on the distinct ecology and scale of these habitats, and beaver modified habitats are a

special classification based on one species. However, the ecosystem changes brought about by BMF does have positive ripple effects across multiple species (including SGCN, as noted in this section) and key habitats. Making beaver modified habitats a strategy habitat would benefit and amplify the value of this draft SWAP in terms of on-ground impact, as well as in making associated funding accessible for beaver-based restoration. We consider this a shortcoming of this Plan. The current appendix is a good general knowledge source on the biology and ecology of beaver, but it brings no conservation value-add for beaver, or for the species and habitats that depend on or are influenced by beaver modified habitats. This appendix does not function as an action plan, rather an information source.

Thank you for accepting these comments and for considering our recommendations.

Sincerely,

Joe Liebezeit,Conservation Co-Director, ***Bird Alliance of Oregon***
Bethany Cotton, Conservation Director, ***Cascadia Wildlands***
Joseph Vaile, Senior Northwest Program Representative, ***Defenders of Wildlife***
Kelly Peterson, Oregon Senior State Director, ***Humane World for Animals***
Brian Posewitz, Director, ***Humane Voters Oregon***
Danielle Moser, Wildlife Program Manager, ***Oregon Wild***
Sally Compton, Executive Director, ***Think Wild***
Sristi Kamal, Deputy Director, ***Western Environmental Law Center***

BORISCH Roxann B * ODFW

From:	Jane Bacchieri <jane@elakhaalliance.org>
Sent:	Thursday, July 31, 2025 11:29 AM
To:	OCS Revision * ODFW
Cc:	Bob Bailey; Kyle Motley
Subject:	Elakha Alliance comments on Draft SWAP
Attachments:	Elakha Comments to ODFW .pdf

Dear SWAP/OCS Revision Team,

Thank you for the opportunity to comment on the Draft Statewide Wildlife Action Plan. The Elakha Alliance submitted comments via the online comment form. Additionally, we prepared this comment letter (also attached) which includes more detailed information and context for needed conservation actions along with links to referenced material and a list of citations. These comments are intended to complement the comments we submitted online and provide additional information that may be needed by ODFW for further revisions to the SWAP to support the conservation of sea otters as a Species of Greatest Conservation Need and the conservation and recovery of eelgrass and kelp as Key Habitats.

Thank you for your efforts to revise this important plan for the conservation of Oregon's wildlife and critical habitats.

Sincerely,

Jane Bacchieri

--

Jane Bacchieri (she/her)
Executive Director
Elakha Alliance
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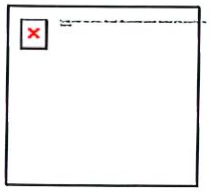

July 31, 2025

TO: Oregon Department of Fish and Wildlife
OCS.Revision@ODFW.Oregon.gov

FROM: Jane Bacchieri, Executive Director, Elakha Alliance
jane@elakhaalliance.org

SUBJECT: Comments on DRAFT Statewide Wildlife Action Plan

The Elakha Alliance is an Oregon nonprofit organization with a mission to make Oregon's marine and coastal ecosystems and communities more robust and resilient by restoring a healthy population of sea otters to the Oregon coast. The Elakha Alliance has spent the past seven years working with leading marine ecologists to develop the scientific basis for and identifying the ecological and economic benefits of returning these animals to their former habitats in Oregon. In summary, the scientific literature is unequivocal: sea otters, a keystone species, are fundamental to the ecological health and productivity of the nearshore marine environment and, not surprisingly, the estuarine environment.

First, we are pleased that the draft SWAP:

1. lists sea otters (*Enhydra lutris*) as a Species of Greatest Conservation Need;
2. lists kelp beds (*Nereocystis leutkiana*) as a Key Habitat and the algae itself as as a Species of Greatest Conservation Need; and
3. lists eelgrass beds as a Key Habitat and Native eelgrass (*Zostera marina*) as a Species of Greatest Conservation Need.

These are important improvements over the 2016 - 2025 Nearshore Conservation Strategy that reflect the condition of and threats to kelp and eelgrass as well as the absence of sea otters, a keystone species that once occupied habitats along the Oregon coast. However, the SWAP does not follow up these designations with Conservation Actions to address their needs.

The Elkaha Alliance urges that the SWAP include the following NEEDED Conservation Actions:

1. Eelgrass beds.

   Eelgrass beds are listed as a Key Habitat (p. 124), discussed under Estuaries (p. 23), and listed as a Species of Greatest Conservation Need (p.7). The invasive non-native European Green crab (*Carcinus maenus*) is discussed in Key Habitat (p. 27) as a Limiting Factor/Invasive Species in estuaries but the impact of the European green crab on eelgrass

beds is not described although it is known to be significant. This same crab species is also listed and described in Key Conservation Issues, p. 64, pp. 65-6.

NEEDED: add "return sea otters to Oregon" as a Conservation Action to control European Green crabs, an invasive non-native species that is known to contribute to the destruction of eelgrass beds, and to potentially contribute to the resilience of eelgrass beds in the face of climate change.

- Key sources for eelgrass and sea otters

  Jeppson et al (2025) found that a recovering population of the southern sea otter suppresses Green crab, a global marine invader. They found that while Elkhorn Slough (CA) hosts various other species likely to prey on green crabs (sharks, rays, wading birds, larger crabs), Green crab numbers only dropped following an increase in sea otter numbers.

  Hughes et al (2013) found that complex top-down effects of sea otter predation resulted in positive benefits to eelgrass beds, mitigating the effects of continuing and increasing nutrient loading in Elkhorn Slough.

  Hughes et al (2020) showed that sea otters can have strong effects on estuarine ecosystems, fostering seagrass resilience through their consumption of invertebrate prey.

2. Kelp beds

There is no more important marine habitat on the Oregon coast than that created by the presence of kelp, especially the canopy-forming bull kelp. The draft SWAP describes the many biological, ecological and physical attributes and consequences of kelp beds and acknowledges (line 3370) that the absence of kelp on some rocky substrate may be due [emphasis added] to an "abundance of organisms that consume kelp (e.g., sea urchins)..." Inexplicably, the draft fails to describe the well-understood role of sea otters or of sunflower sea stars (*Pycnopodia*) in maintaining kelp beds by controlling the number of sea urchins or describing the consequences for kelp beds when sea otters are absent. The draft makes the unsupported statement that "*Oregon's nearshore marine resources are thriving in a healthy, functioning ecosystem…*" a statement not supported by facts presented in the draft itself.

NEEDED: add "return sea otters to Oregon" as a Conservation Action to control sea urchins, whose uncontrolled predation on kelp is known to destroy kelp beds and associated habitat values.

NEEDED: add "return sunflower sea stars (*Pycnopodia helianthoides*) to Oregon" as a Conservation Action to control sea urchins that predate on kelp and other macroalgae.

(NOTE: The exact methods for returning sea stars are presently unknown but nonetheless this should be a recommended action.)

- Key sources for kelp and sea otters

  Estes et al (1978): "Predation by the sea otter (*Enhydra lutris*) limits epibenthic invertebrates, especially sea urchins (*Strongylocentrotus polyacanthus*), in turn allowing a luxuriant development of the macroalgal canopy."

  Estes and Duggins (1995) studying the presence of macroalgae (kelp) in Alaska concluded that "...where sea otters occur herbivores are rare and plants are abundant, whereas when sea otters are absent herbivores are relatively common and plants are rare."

  Hollarsmith, et al (2024) found "Kelp in Southeast Alaska showed persistence and spatial increase that closely matched increases in the range of sea otters."

  Nicholson, et al (2024) demonstrate that "Sea otter recovery buffers century-scale declines in California kelp forests." See also this related article.

- Key sources for sunflower sea stars

  Duggins (1983) observed that the presence of *Pycnopodia* elicited a strong escape response in two of three species of sea urchins that created short-lived herbivore-free patches in subtidal algal assemblages.

  Mancuso et al (2025) found, through field experiments, that the chemical cue of sunflower sea stars elicits a localized landscape of fear of approximately 15 m^2 that suppresses grazing, and that the non-consumptive effects of *P. helianthoides* on sea urchin behaviour may be important for kelp restoration.

  KING5-TV (2024) report on raising sunflower sea stars at the University of Washington Friday Harbor lab.

3. Sea otters

   The Elakha Alliance seeks to restore sea otters to Oregon for three basic reasons:
   - To restore and protect Oregon's nearshore and estuarine ecosystems. The complex ecological connections between sea otters, kelp, and eelgrass mean that multiple conservation objectives can be achieved by returning them to Oregon;
   - To advance the conservation of the species itself; and
   - To restore an animal of ancient cultural importance to coastal Indian people.

It should be noted that even after returning a founding population of sea otters to Oregon, it will take decades for a population to become established and even more time to effect the ecological and environmental changes associated with established populations in California and Alaska. This is no quick fix. But if Oregon is serious about long-term conservation of nearshore marine and estuarine ecosystems, especially in light of changing ocean conditions resulting from climate change, the return of sea otters to Oregon is essential. See Chapter 5, Ecological Effects, Elakha Alliance Feasibility Study (2022)

NEEDED: add "return sea otters to Oregon" as a Conservation Action for this SGCN. The scientific literature is unequivocal on the ecological benefits of sea otters.

- Reintroduction is a proven, science-based conservation tool.
  Sea otter reintroductions have succeeded across the North Pacific, including in Alaska, British Columbia, Washington, and California. According to the USFWS, about 35% of the current global sea otter population exists today because of previously successful reintroduction efforts. These programs demonstrate that reintroduction is not experimental—it's a well-established, effective method for recovering sea otter populations. Prior sea otter reintroductions are discussed in Chapter 2, History of Prior Sea Otter Translocations, Elakha Alliance Feasibility Study (2022).

- Reintroduction will fill a critical habitat gap and safeguards the species' future.
  Oregon represents a significant part of the largest remaining unoccupied section of the sea otters' historical range on the Pacific coast. Without recolonization or reintroduction, the species remains vulnerable elsewhere to oil spills, disease outbreaks, and localized ecological collapse in its current fragmented populations. Establishing a new, geographically distinct population increases long-term species survival and resiliency. See Chapter 3, Population and Demographic Considerations, Elakha Alliance Feasibility Study (2022).

- Reintroduction will help to restore lost genetic diversity and adaptive potential.
  Oregon historically served as a genetic "bridge" between the northern and southern sea otter subspecies. Reintroducing sea otters here would reconnect these populations, enhancing the species' overall genetic diversity. Greater genetic variation improves the species' ability to adapt to future environmental changes, disease pressures, and shifting ocean conditions—an essential step for long-term recovery. Genetic considerations are discussed in Chapter 4, Genetic Considerations, Elakha Alliance Feasibility Study (2022).

- A 2022 feasibility report by the U.S. Fish & Wildlife Service concluded that the reintroduction of sea otters in the region, which includes Oregon, would result in significant conservation benefits to the species and to the nearshore marine ecosystem.

CITATIONS

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Estes, J., Smith, N., Palmisano, J. (1978). Sea Otter Predation and Community Organization in the Western Aleutian Islands, Alaska. Ecology **59**, 4. https://doi.org/10.2307/1938786

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BORISCH Roxann B * ODFW

From: Fran Cafferata <fran@cafferataconsulting.com>
Sent: Thursday, July 31, 2025 1:56 PM
To: ECKRICH Carolyn A * ODFW; OCS Revision * ODFW
Cc: Ashley Russell
Subject: Comments from CTCLUSI on Conservation Opportunity Areas 2025 mapping revisions
Attachments: Oregon SWAP and COA Comments_CTCLUSI.pdf

Hello Carolyn,

I'm submitting comments on behalf of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians. Please see attached.

Thank you,
Fran

Fran Cafferata, CWB®
Cafferata Consulting
503-680-7939
cafferataconsulting.com
She/Her/Hers

CONFEDERATED TRIBES OF
COOS, LOWER UMPQUA AND SIUSLAW INDIANS
TRIBAL GOVERNMENT
1245 Fulton Avenue - Coos Bay, OR 97420
Telephone: (541)888-9577 Toll Free 1-888-280-0726 Fax: (541)888-2853

July 31, 2025

Carolyn A. Eckrich
SWAP Revision Coordinator Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR97302

RE: Conservation Opportunity Area (COA) Boundaries Draft (2025 Revision)

Ms. Eckrich and the SWAP Revision Team,

I am writing in response to your request for comments on the Conservation Opportunity Area 2025 mapping revisions. Please be aware that the Tribe does not permit outside entities to include mapping on Tribal lands. We respectfully request that hexagons that fall within Tribal lands be removed from mapped COAs.

The polygons included in the *Draft 2025 COAs* dataset that are mapped on Tribal lands are COA_num_for_final #s 37, 38, 39, and 44. It is our understanding that Tribal sovereignty will be honored. Please confirm receipt of our request and provide assurance the final mapping will exclude CTCLUSI Tribal lands.

Sincerely,

Fran Cafferata
Certified Wildlife Biologist® representing Confederated Tribes of the Coos, Lower Umpqua & Siuslaw Indians

Cc:
Ashley Russell (miluk coos & pamunkey)
Director Culture and Natural Resources
The Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians
1245 Fulton Ave
Coos Bay, OR 97420
(541) 888-7511 –office

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, July 31, 2025 2:40 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#834]

Are you an Oregon resident? Yes

Email lclark@NCASI.org

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

SWAP Key Conservation Issues:

NCASI submitted comments for these KCIs during the first draft phase. We ask that you please review the comments and references listed below. Specifically, we suggest adding language to highlight how active forest management practices can help to mitigate wildfire risk and severity, distinguish between agricultural and forestry pollution, and modify forestry and sedimentation comments.

ALTERED FIRE REGIMES

Fire Suppressions and Uncharacteristically Severe Wildfire

Lines 1520-1525:

Please consider adding a description of how active forest management can help lower wildfire risk. For example, privately managed forests often conduct pre-commercial thinning when stands are 10-20yrs old to improve forest health and tree growth, which helps mitigate fire risk. Contemporary practices include thinning to mitigate the probability of large fires which protect timber assets but also improve overall forest health through active forest management activities (e.g., prescribed burns, fuels treatments).

Forested Landscapes

Lines 1550-1554

Various studies have asserted that intensively managed forests burn with greater severity than public forests managed

less intensively. Zald and Dunn (2018) found that in the Douglas complex 2013 fire in southwestern Oregon, commercial forests experienced higher burn severity. Yet, studies that solely report fire severity fail to consider the full complexity of the landscape and often do not provide useful conclusions for land managers. The potential for high-intensity fires is more dependent on seasonal drought, fuel, and fire weather conditions than on forest management practices. Additionally, of the success of fire risk mitigation from selective logging will be dependent on harvest practices, forest type, and the surrounding environment.

Zald, H.S.J., and C.J. Dunn. 2018. Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape. Ecological Applications 28(4):1068–1080.

Lines 1560–1566

Although wildfires may increase in severity, frequency, and extent due to drought and historical fuel buildup, wildfire risk can be reduced with active forest management (e.g., thinning, some types of salvage logging). As an example, forest management (i.e., thinning, reducing basal area) can reduce tree mortality from drought and insects. Simple claims that forest management will increase tree mortality or fire severity are typically based on incomplete assessments.

Loehle, C. 2020. Historical Forest Changes in the Western United States. Forestry Chronicle 96:36–49

ALTERED FIRE REGIMES: GOALS AND ACTIONS

Goal 1, Action 1.3

Lines 1707–1713

There are a variety of management practices, tools, and regulatory mechanisms that private landowners employ to reduce the probability and/or effects of large fires. The benefits of thinning and fuel reduction achieved via timber harvest are obvious enough that major initiatives to achieve these benefits are ongoing in western US National Forests (e.g., Belavenutti et al. 2021).

Belavenutti, P., W. Chung, and A.A. Ager. 2021. The economic reality of the forest and fuel management deficit on a fire prone western US National Forest. Journal of Environmental Management 293:112825. https://doi.org/10.1016/j.jenvman.2021.112825.

KCI POLLUTION

Agricultural and Forestry Pollution

Line 3129

This "Pollution" document does not adequately distinguish forestry from agriculture. Oregon Forest practices are highly regulated, continually updated via adapted management, and recently forestry land-owners across Oregon voluntarily

agreed to update Forest Practices Rules via the Private Forest Accord. Three paired watershed studies in Oregon have documented the effectiveness of forest practices (ca. 2008-2015) on limiting adverse effects of sediment delivery to surface waters. We request that this document better link forestry to its unique regulatory environment, as has been incorporated into the "Water Quality" document. We provide further information and examples below:

Multiple paired watershed studies in Oregon found no effect of contemporary forest harvesting on stream sediment concentrations (Arismendi et al. 2017; Hatten et al. 2017). Arismendi et al. (2017) documented no increases in suspended sediment concentrations and turbidity below road crossings in the Trask watershed (Oregon). Others have noted how sediment yield can be modified by geology and geomorphology (Bywater-Reyes et al. 2017). In comparing suspended sediment concentrations in the Alsea watershed between the original 1958 (historical, pretreatment) project and a follow-up project (post treatment), there was no evidence that contemporary harvesting affected suspended sediment concentrations or yields (Hatten et al. 2017). Additionally, other research evaluating contemporary forest harvest supports the effectiveness of current practices by showing that in-stream sediment sources contributed 80% of sediment for both reference and harvested watersheds (Rachels et al. 2020).

CMP Direct Threats 9.3

Lines 3168-3173

Forestry related stream sediment input is highly regulated in Oregon, and has been well studied, including several recent studies. This document should, at minimum, separate forestry from agriculture.

Lines 3173-3175

This general statement lumps historical practices with contemporary practices, but in the state of Oregon recent paired watershed studies show limited effects of harvesting on stream sediment concentrations (Arismendi et al. 2017; Hatten et al. 2017). This statement needs to be modified to acknowledge the investment in limiting these adverse effects, documentation of this abatement (peer-reviewed publications), and continued efforts to use adaptive management to address these issues.

Arismendi, I., J.D. Groom, M. Reiter, S.L. Johnson, L. Dent, M. Meleason, A. Argerich, and A.E. Skaugset. 2017. Suspended sediment and turbidity after road construction/improvement and forest harvest in streams of the Trask River Watershed Study, Oregon. Water Resources Research 53:6763-6783, doi:10.1002/2016WR020198.

Bywater-Reyes, S., C. Segura, K.D. Bladon. 2017. Geology and geomorphology control suspended sediment yield and modulate increases following timber harvest in temperate headwater streams. Journal of Hydrology 548:754-769.

Hatten, J.A., C. Segura, K.D. Bladon, V.C. Hale, G.G. Ice, and J.D. Stednick. 2017. Effects of contemporary forest harvesting on suspended sediment in the Oregon Coast Range: Alsea Watershed study revisited. Forest Ecology and

Management 408:238–248.

Rachels, A.A., K.D. Bladon, S. Bywater-Reyes, J.A. Hatten. 2020. Quantifying effects of forest harvesting on sources of suspended sediment to an Oregon Coast range headwater stream. Forest Ecology and Management 466:11823. https://doi.org/10.1016/j.foreco.2020.118123.

KCI WATER QUALITY

Water Quality Goals and Actions

Goal 1, Action 1.4

Line 3950

Acknowledge or link the new DEQ biocriteria (currently open for public comment period). In this draft methodology (which has undergone peer review) only MMI and O/E are included (not IBI) consider consistently references the same indices of the current biocriteria (and associated rationale for these indices). Link to draft bioassessment methodology: https://www.oregon.gov/deq/wq/pages/integrated-report-improvements.aspx

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, July 31, 2025 2:54 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#837]

Are you an Oregon resident? Yes

Email lclark@NCASI.org

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

KEY CONSERVATION ISSUES:

The National Council for Air and Stream Improvement, Inc. (NCASI) serves forest landowners, managers, and the forest products sector as a center of excellence for providing technical information and rigorous scientific research needed to achieve the sector's environmental goals and principles, including species conservations. NCASI (http://www.ncasi.org) has a long history of research investigating habitat relationships of forest-associated species and has collaborated with state and federal agencies, universities, and others on studies investigating the biology of aquatic organisms in managed forest settings. Additionally, NCASI is interested in developing cost-effective measures for forest landowners when conserving species.

NCASI submitted comments for these Key Conservation Issues (KCIs) during the first draft phase. We ask that you please review the comments and references listed below. Specifically, we suggest adding language to highlight how active forest management practices can help to mitigate wildfire risk and severity, distinguish between agricultural and forestry pollution, and modify forestry and sedimentation comments.

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Bywater-Reyes, S., C. Segura, K.D. Bladon. 2017. Geology and geomorphology control suspended sediment yield and modulate increases following timber harvest in temperate headwater streams. Journal of Hydrology 548:754–769.

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BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, July 31, 2025 3:06 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#841]

Are you an Oregon resident? Yes

Email lclark@NCASI.org

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

SWAP SCGN:

The National Council for Air and Stream Improvement, Inc. (NCASI) serves forest landowners, managers, and the forest products sector as a center of excellence for providing technical information and rigorous scientific research needed to achieve the sector's environmental goals and principles, including species conservations. NCASI (http://www.ncasi.org) has a long history of research investigating habitat relationships of forest-associated species and has collaborated with state and federal agencies,
universities, and others on studies investigating the biology of aquatic organisms in managed forest settings. Additionally, NCASI is interested in developing cost-effective measures for forest landowners when conserving species.

For the initial round of SGCN and SGIN comments, NCASI provided ODFW with summaries of collaborative research on several species listed. In response to the recent request for comments regarding the SWAP final 2025 SGCN and SGIN lists, we resubmit to ODFW the following current and relevant research on the species listed below. We encourage you to review these comments and the published literature listed below to provide insight into species management/habitat use across a landscape mosaic.

AMPHIBIANS

Columbia Torrent Salamander (Rhyacotriton kezeri)

NCASI in collaboration with Oregon State University, USGS, and Rocinante Consulting, conducted physical and eDNA

sampling for the Columbia torrent and southern torrent salamanders in 27 subbasin watersheds in the northern Oregon Coast Range in 2024. Torrent salamanders were physically detected in 15 of 27 watersheds, primarily in headwater (1st order) streams; eDNA results are not yet complete. Data collection has continued across 45 additional watersheds in 2025 with similar naïve occupancy rates. Data summaries or basic geographic distribution data (HUC 12 occupancy) may be available on request.

BIRDS

Black-backed Woodpecker (Picoides arcticus)

Recent NCASI-led and NCASI funded research on black-backed woodpeckers highlighted the extensive use of unburned forests by black-backed woodpeckers in Oregon. Picoides arcticus was considered a post-fire obligate species throughout much of its range. However, the research summarized in Verschuyl et al (2021) and Kerstens et al (2023) provides a different picture for the Oregon Cascades. Unburned forests in Oregon are providing support for black-backed woodpeckers, with high occupancy in various montane (unburned) forest types (Verschuyl et al. 2021). Kerstens et al. (2023) found black-backed woodpeckers also breeding in unburned forests, with similar breeding success, although at lower nest densities than in recently burned forests. Prior assumptions about Picoides arcticus populations included limited connectivity between disjunct recent fire-associated sub-populations. Based on the findings described above, it has become clear that breeding populations of black-backed woodpeckers in the Oregon Cascades are connected through, and supported by, unburned forest.

Kerstens, M. E., & Rivers, J. W. (2023). Is green the new black? Black-backed Woodpecker vital rates do not differ between unburned and burned forests within a pyrodiverse landscape. Ornithological Applications 125: 1-14, https://doi.org/10.1093/ornithapp/duad010

Verschuyl, J., Stephens, J. L., Kroll, A. J., Halstead, K. E., & Rock, D. (2021). Black-backed woodpecker occupancy is extensive in green conifer forests of the southern cascade mountains, Oregon. Avian Conservation and Ecology, 16(1). https://doi.org/10.5751/ACE-01725-160104

Common Nighthawk (Chordeiles minor)

NCASI staff conducted avian point count surveys in the Oregon Coast Range from May 24th to July 8th of 2022 and from May 22nd to July 7th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff observed Common Nighthawks away from roads that often result in observation bias, and in a variety of different forest management treatments, often foraging above young stands that have not yet closed canopy. In 2023 Chordeiles minor were found in recently clearcut and thinned stands along the Oregon Coast Range. Unpublished reports and data

summaries from the PPAL study may be available on request.

Marbled Murrelet (Brachyramphus marmoratus)

NCASI staff participated in two recent studies related to the marbled murrelet that we highlight here for incorporation in the ODFW SWAP species comments. Loehle et al. (2022) describes a stable at-sea population, and the importance of considering population dynamics at the largest spatial scales due to likely breeding season movements between NWFP monitoring zones, and between the US and Canadian waters. Hamer et al. (2021) uses a Bayesian hierarchical model to assess fine-scale habitat characteristics. Model results highlight the importance of branch- (platform size, moss cover, horizontal cover) and tree-scale (moss depth, and platform counts) covariates which were all positively related to the probability of a murrelet nest. At a slightly larger patch-scale, there was a negative relationship between the density of platform trees and probability of a murrelet nest. This less intuitive finding may suggest uniform stands with many "marginal" platform trees may be less desirable than canopy variation with a few larger trees.

Loehle, C., Verschuyl, J., & Solarik, K. A. (2022). Population trends and vital rates for marbled murrelet (Brachyramphus marmoratus) in the Pacific Northwest, USA. Northwestern Naturalist, 103(1), 20-29. https://doi.org/10.1898/1051-1733-103.1.20

Hamer, T., Nelson, K., Jones, J., & Verschuyl, J. (2021). Marbled Murrelet nest site selection at three fine spatial scales. Avian Conservation and Ecology, 16(2): 4. https://doi.org/10.5751/ACE-01883-160204

Willow Flycatcher (Empidonax traillii)

NCASI staff conducted avian point count surveys in the Oregon Coast Range from May 24th to July 8th of 2022 and from May 22nd to July 7th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff observed Willow Flycatchers away from roads that often result in observation bias, and in a variety of different forest management treatments. Empidonax traillii were found primarily in regenerating (recently clearcut) stands along the Oregon Coast Range. Unpublished reports and data summaries from the PPAL study may be available on request.

Wrentit (Chamaea fasciata)

NCASI staff conducted avian point count surveys in the Oregon Coast Range from May 24th to July 8th of 2022 and from May 22nd to July 7th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff observed Wrentits away from roads that often result in observation bias, and in a variety of different forest management treatments. In 2023 Chamaea fasciata were found in thinned and closed stands along the Oregon Coast Range highlighting use of stands with some mature forest cover. Unpublished reports and data summaries from the PPAL

study may be available on request.

INVERTEBRATES

Western Bumble Bee (Bombus occidentalis) –new comment

For the past 5 years, NCASI has been conducting pollinator surveys across western Oregon (Coast and Cascade Ranges) in collaboration with private industry, OSU/U of O, state, and federal agencies to document species occurrence and richness in forest stands with varying characteristics. We have collected and identified 1000's of bees and conducted 100's of botanical surveys. We have documented occurrence/no occurrence locations of western bumble bees during these survey efforts. These data may be available on request.

MAMMALS

California Myotis (Myotis californicus)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified California Myotis using Sonobat's auto classifier. In the 2022 and 2023 study Myotis californicus were detected in regenerating (recently clearcut), thinned, and closed stands. We will present preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available on request.

Fringed Myotis (Myotis thysanodes)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Fringed Myotis using Sonobat's auto classifier. In the 2022 and 2023 study Myotis thysanodes were detected in regenerating (recently clearcut), thinned, and closed stands. We will present preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available on request.

Hoary Bat (Lasiurus cinereus)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Hoary Bats across the northern Oregon Coast Range using Sonobat's auto classifier. Lasiurus cinereus were detected in regenerating (recently clearcut), thinned, and closed stands. We will present preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data

summaries, and our poster from the PPAL study may be available on request.

Little brown Myotis (Myotis lucifugus)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Little brown Myotis using Sonobat's auto classifier. Myotis lucifugus were detected in regenerating (recently clearcut), thinned, and closed stands. We will present preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available on request.

Long-legged Myotis (Myotis volans)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Long-legged Myotis using Sonobat's auto classifier. In the 2022 and 2023 study Myotis volans were detected in regenerating (recently clearcut), thinned, and closed stands. We presented preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available on request.

Pacific Fisher (Pekania pennanti)

NCASI staff, in collaboration with Oregon State University, have collected extensive data on the distribution, movement and habitat use by fishers. We have worked with detection dog teams to collect scat samples throughout much of forested Oregon and coastal northern California. Barry et al. (2021) integrated data from both camera and dog teams to evaluate probability of detection and occurrence following several extirpation and expansion hypotheses. Barry (2018) also includes more detail regarding bait and detectability. Martin et al. (2025) focused on predicted habitat use in the southern Oregon Cascades. Moriarty et al. (2019) described rest and den sites, movement including movement of 2 denning females, and home range summaries in the same geography. Hance et al. (2021) focused on identifying rest locations using GPS data and provides summaries of their natural history (e.g., amount of time active) during their monitored periods. Barry et al. (in prep) are working on a diet summary and influence of competitors and predators. Unpublished reports and data summaries may be available on request.

Barry, B. R., K. Moriarty, D. Green, R. A. Hutchinson, and T. Levi. 2021. Integrating multi-method surveys and recovery trajectories into occupancy models. Ecosphere 12:e03886.

Barry, B. R. 2018. Distribution, habitat associations, and conservation status of Pacific fisher (Pekania pennanti) in

Oregon. Oregon State University, Corvallis, Oregon, USA.

Hance, D. J., K. M. Moriarty, B. A. Hollen, and R. W. Perry. 2021. Identifying resting locations of a small elusive forest carnivore using a two-stage model accounting for GPS measurement error and hidden behavioral states. Movement Ecology 9:1-22.

Martin, M. E., K. M. Moriarty, S. Hayner, M. Fiorella, C. D. Ducey, B. Hollen, and S. M. Matthews. 2025. Forest Structure and Stand Characteristics Influence the Space Use and Fine-Scale Movements of Fishers (Pekania pennanti). Animal Conservation.

Moriarty, K. M., C. M. Kelsey, and S. M. Matthews. 2019. Assessing den, rest site, and movement characteristics by Pacific fisher (Pekania pennanti) in the southern Oregon Cascades: Final report.

Pacific Marten and Coastal Pacific Marten (Martes caurina (humboldtensis))

NCASI staff have collected data on, and DNA from, Pacific Marten. We have worked with detection dog teams to collect scat samples throughout much of forested Oregon and coastal northern California. We are currently assessing Pacific marten for the IUCN and have a new range map that should soon be ready for public distribution. For coastal (Humboldt) martens, we remain a leader in scientific data collection from non-invasive monitoring, partnering with Oregon State (Levi, Hallerud) to innovate genomic tools, and using GPS collar movement data to inform connectivity and habitat use. Marie Martin (OSU) and many collaborators, including the Levi (OSU) Conservation Genetics lab, have a paper in review on diet of Pacific martens which will be available this year. We have published 9 peer-reviewed articles in the past 8 years and have >5 in preparation. Please let us know if you would like additional information.

Martin, M. E., M. S. Delheimer, K. M. Moriarty, A. M. Roddy, C. E. Eriksson, M. Szykman Gunther, J. A. Allen,

J. A. Hartman, H. Smith, and T. Levi. In review. From coastlines to mountain crests: regional and continental variation in the diet of North American martens.

Red Tree Vole (Arborimus longicaudus)

NCASI staff have been contributing to red tree vole research since 2020. Piasecki (2023) outlines the occurrence of red tree voles in younger forest stands, the types of nesting structures used, a survival analysis of nest persistence, conspecific interactions with other canopy dwelling species, and red tree vole nest persistence over a 4-year period in stands that ranged from 20 to >400 years of age. One chapter has been formatted and will be submitted for

publication by October 1, 2025. A second master's student under the direction of Dr. Katie Dugger, Mackenzie McCoy, will be investigating the survival, reproduction, and movement of tree voles from both remote cameras and radio-collared individuals, mostly in stands <40 years of age but with some comparisons to old forests. McCoy will finish her thesis by summer 2026. A new study is being launched to evaluate red tree vole occurrence within and adjacent to riparian areas in stands that differ in age. In addition, we are compiling tissue samples to process for genomic extraction for future SNP development during 2025. We have all samples from the USDA Forest Service Pacific Northwest Research Station as well as tissue samples collected by NCASI. We seek additional samples to ensure genetic diversity between our data, which would provide the most capacity for future development.

Piasecki, J. T. 2023. Red tree voles in fragmented forests. Master's of Science, Oregon State University, Corvallis, Oregon, USA.

Piasecki, J. T., K. Dugger, J. D. Bailey, and K. M. Moriarty. In review. Nest persistence and habitat use by red tree voles in Douglas-fir forests: implications for canopy-dependent species.

McCoy, M., J. T. Piasecki, K. M. Moriarty, J. D. Bailey, and K. Dugger. 2023. Searching for nests in the canopy: an elevated challenge, in Conference Oregon Chapter of the Wildlife Society. Bend, Oregon, USA.

Ringtail (Bassariscus astutus)

NCASI staff are working on summarizing the diet of ringtails throughout southern Oregon using DNA metabarcoding and diet analyses. The Levi lab processed all the scats collected from the ODFW ringtail study, and we will be combining those samples with any collected from marten and fisher-focused studies. Unpublished reports, location data, and data summaries would be available, on request. See also Gundermann et al. (2023) from northern California.

Gundermann, K. P., D. S. Green, F. E. Buderman, C. H. Myers, J. M. Higley, R. N. Brown, and S. M. Matthews. 2023. Ecological characteristics of diurnal rest sites used by ringtails (Bassariscus astutus). Northwest Science 96:220-233, 214.

Silver-haired Bat (Lasionycteris noctivagans)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Silver-haired Bats using Sonobat's auto classifier. In 2022 and 2023 Lasionycteris noctivagans were detected in regenerating (recently clearcut), thinned, and closed stands showing no

effect of forest management intensity on their abundance. We presented preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available, on request.

Townsend's Big-eared Bat (Corynorhinus townsendii)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Townsend's Big-eared Bats using Sonobat's auto classifier. In 2022 Corynorhinus townsendii were detected in regenerating (recently clearcut) and thinned stands. In 2023 Corynorhinus townsendii were detected only in regenerating (recently clearcut) stands. We presented preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available on request.

The NA OSU Cascades Bat Hub is listed as a reference, but this data should be used cautiously. 10 nights of data from 10-20 locations (which is over 10 times the current effort), would only allow for detecting a 50% decline following 5 years (e.g., Baumgardt et al. 2022)

Baumgardt, J. A., M. L. Morrison, L. A. Brennan, H. T. Davis, R. R. Fern, J. M. Szewczak, and T. A. Campbell. 2022. Monitoring occupancy of bats with acoustic data: power and sample size recommendations.

Western North American Naturalist 82:36-49.

Western Long-eared Myotis (Myotis evotis)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Long-eared Myotis (western) using Sonobat's auto classifier. Myotis evotis were detected in regenerating (recently clearcut), thinned, and closed stands. We presented preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available, on request.

Yuma Myotis (Myotis yumanensis)

NCASI staff installed bat recording devices (Pettersson Elektronik D500X) in the Oregon Coast Range from June 16th to September 20th of 2022 and from May 17th to September 11th of 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. NCASI staff identified Yuma Myotis using Sonobat's auto classifier. In the 2022 and 2023

study Myotis yumanensis were detected in regenerating (recently clearcut), thinned, and closed stands. We presented preliminary results at the Western Bat Working Group conference in April 2025. Unpublished reports, data summaries, and our poster from the PPAL study may be available on request.

SGIN-BIRDS

Rufous Hummingbird (Selasphorus rufus)

NCASI staff conducted audio/visual surveys of hummingbirds in 2022 and 2023 as part of the Pollinator Partners Across Landscapes (PPAL) study. In the Oregon Coast Range focused PPAL study NCASI staff observed Rufous Hummingbirds away from roads that often result in observation bias, and in a variety of different forest management treatments. NCASI and OSU have also collaborated on a 12-year study on avian abundance across a gradient of forest management intensity, also in the Oregon Coast Range (Intensive Forest Management study or IFM). In the IFM study, Selasphorus rufus abundance was initially reduced in more intensive forestry treatments, but they were resilient to the simplification of the vegetation community that remained in more intensive treatments from year 5 through 12. Despite initial lower abundance in intensive treatments, there was no effect of forest management intensity on Selasphorus rufus abundance after the first 4 years of stand growth. Unpublished reports and data summaries from both efforts may be available, on request.

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, July 31, 2025 3:17 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#844]

Are you an Oregon resident? Yes

Email lclark@NCASI.org

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

Key Habitats:

The National Council for Air and Stream Improvement, Inc. (NCASI) serves forest landowners, managers, and the forest products sector as a center of excellence for providing technical information and rigorous scientific research needed to achieve the sector's environmental goals and principles, including species conservations. NCASI (http://www.ncasi.org) has a long history of research investigating habitat relationships of forest-associated species and has collaborated with state and federal agencies,
universities, and others on studies investigating the biology of aquatic organisms in managed forest settings. Additionally, NCASI is interested in developing cost-effective measures for forest landowners when conserving species.

NCASI is resubmitting Key Habitat comments for your review. Please consider this new information, including additional data on SGCN species habitat.

FLOWING WATERS AND RIPARIAN HABITATS

Limiting Factor: Water Temperature

Lines 1219-1229

This paragraph needs to acknowledge seasonal dynamics/life stages, etc. Low DO, for example, is not often an issue during high flows.

LATE SUCCESSIONAL AND MIXED CONIFER FORESTS

West Cascades-Conservation Overview

Lines 1698-1701

Please review the references below and consider rewording this sentence. Multiple studies have documented a variety of species that utilize early-seral vegetation types (i.e., younger forests). A mosaic of forest age classes exists across a managed forest landscape, which contributes to landscape-scale biodiversity. Often, the highest species diversity in productive/managed forests occurs in open canopy stages (Verschuyl et al. 2008, see also McWethy et al. 2010, Swanson et al. 2014).

Verschuyl, J.P., A.J. Hansen, D.B. McWethy, R. Sallabanks, and R.L. Hutto. 2008. Is the effect of forest structure on bird diversity modified by forest productivity? Ecological Applications 18(5):1155-1170.

McWethy, D.B., A.J. Hansen, and J.P. Verschuyl. 2010. Bird response to disturbance varies with forest productivity in the northwestern United States. Landscape Ecology 25:533-549.

Swanson, M.E., N.M. Studevant, J.L. Campbell, and D.C. Donato. 2014. Biological associates of early-seral pre-forest in the Pacific Northwest. Forest Ecology and Management 324:160-171.

Lines 1747-1750

Although these species are associated with structural elements of late successional mixed conifer forests, younger managed forests may also contain similar structural elements, although typically at a lower density. Recent research shows species like red tree voles, NSO, fisher, and martens using younger stands. Furthermore, forest edge is also beneficial for foraging/hunting for a number of species. Hence, the importance of a mosaic of various forest structures/complexities across the landscape. Examples: NCASI staff have been contributing to red tree vole research since 2020. Piasecki (2023) outlines the occurrence of red tree voles in younger forest stands, the types of nesting structures used, a survival analysis of nest persistence, conspecific interactions with other canopy-dwelling species, and red tree vole nest persistence over a 4-year period in stands that ranged from 20 to >400 years of age. Over the coming months, Mackenzie McCoy (master's student) will finish her work investigating the survival, reproduction, and movement of tree voles from both remote cameras and radio-collared individuals, mostly in stands <40 years of age but with some comparisons to old forests.

Piasecki, J. T. 2023. Red tree voles in fragmented forests. Master's of Science, Oregon State University, Corvallis, Oregon, USA.

There has also been ample research documenting how salamanders respond to forest management. Garcia et al. (2020) found the Oregon slender salamander may be more resilient to forest management than previously expected.

Garcia, T.S., J. Johnson, J. Jones, and A.J. Kroll. 2020. Experimental evidence indicates variable responses to forest disturbance and thermal refugia by two plethodontid salamanders. Forest Ecology and Management 464:118045.

Limiting Factors and Recommended Approaches

Lines 1779-1781

However, the OR forest practices rules and PFAs set standards for silvicultural activities on nonfederal lands. Land managers are required to leave a certain number of trees/snags and logs per acre, which helps to maintain a diversity of structural components on the landscape.

SPECIALIZED HABITATS–FOREST OPENINGS

Lines 3893-3895

Sustainable forest management practices on private lands creates temporary early-seral openings that provide essential habitat for a variety of species. NCASI staff conducted avian point count surveys in the Oregon Coast Range from 2022-23 as part of their Pollinator Partners Across Landscapes (PPAL) study. Common nighthawks were observed away from roads that may produce observation bias, and in a variety of different forest management treatments, often foraging above stands that have not yet closed canopy. Nighthawks were also found in recently clearcut and thinned stands along the Oregon Coast Range, whereas willow flycatchers were primarily found in recently clearcut stands. We have also detected several bat species using recent clearcuts, thinned, and closed stands. Unpublished reports and data summaries from the PPAL study may be available on request.

Lines 3895-3898

Intensively managed forests may have openings with structural complexity and diversity, depending on the location, number, and type of retained structures in the stand. Research on retained structures and bird communities in clearcut forests of the PNW has shown that retained structures contribute to bird species usage of clearcuts, with species usage dependent on type of retained structures and species' characteristics.

Linden, D.W., and G.J. Roloff. 2013. Retained structures and bird communities in clearcut forests of the Pacific Northwest, U.S.A. Forest Ecology and Management 310:1045-1056.

Conservation Actions

Line 3904

Following the 2020 OR wildfires, numerous post-fire research efforts were initiated. NCASI has been engaged in better understanding effects of fire and post-fire management on riparian veg communities (structure and diversity). We are completing our 5th year of data collection with an upcoming publication expected soon (Six et al. in review). Effects of salvage logging will be continually assessed as stands regenerate.

This project is also paired with an aquatic study monitoring stream response/conditions post-fire and management (salvage) (Coble et al. 2024).

Six, L. J., J. Verschuyl, A. A. Coble, In Review. Megafires in Oregon: Riparian vegetation layers differ three years after mixed severity fire. Scientific Reports - in-review. https://doi.org/10.21203/rs.3.rs-6205148/v1

Coble, A. A, B. E. Penaluna, L. J. Six, J. Verschuyl, 2024. Fire severity influences large wood and stream ecosystem responses in western Oregon watersheds. Fire Ecology 20:4 (19

WaterWatch of Oregon
Protecting Natural Flows in Oregon Rivers

July 31, 2025

Carolyn A. Eckrich
SWAP Revision Coordinator
Oregon Dept. of Fish and Wildlife
Carolyn.A.Eckrich@odfw.oregon.gov

Re: Comments on Draft State Wildlife Action Plan

Dear Ms. Eckrich and SWAP Revision Team:

Thank you for the opportunity to comment on the draft State Wildlife Action Plan (SWAP). WaterWatch of Oregon (WaterWatch) offers the following comments:

1. WaterWatch would have appreciated a longer, more robust **public comment process** on a full draft of the SWAP. According to our records, a draft of the full SWAP was not released for public comment until July 11, 2025, allowing only 20 days for public comment. Moreover, our understanding is that ODFW intends to seek Commission approval of the plan at its August 15, 2025, meeting, which suggests little opportunity for public comment to significantly impact the final product. We recognize that the public comment period is part of a longer process of community engagement and technical review, but many individuals and groups – particularly those who care deeply about Oregon's fish and wildlife but lack relevant technical expertise and/or experience – likely waited to see a complete draft of the SWAP before seeking to engage in the SWAP revision process. Given the limited time to review and comment on the full plan, WaterWatch's comments below are necessarily general and limited, without limitation as to future comments WaterWatch may make, and/or positions it may take, with respect to matters addressed by, or omitted from, the SWAP.

2. WaterWatch supports and appreciates the emphasis and comprehensive discussions in the draft SWAP on the need to protect and restore **instream flows in Oregon's rivers and streams, and water levels in Oregon's natural lakes**. As noted in the draft SWAP, instream flows and water levels are necessary for survival of many of the species identified in the plan as species of greatest conservation need – both directly because they provide habitat, and indirectly because they are critical to maintaining water quality (such

as by moderating or preventing excessive water temperatures) and providing for fish migration. WaterWatch also appreciates the recognition and thorough discussion regarding the detrimental impact of water withdrawals on ecological conditions necessary to ensure survival of Oregon's fish and wildlife.

3. WaterWatch supports and appreciates the emphasis and comprehensive discussions in the draft SWAP on protection and restoration of **passage for native migratory fish**. Fish passage is critical to preserving and restoring Oregon's fish populations, including fish species identified in the draft SWAP as species of greatest conservation need. Moreover, as the draft SWAP notes, fish passage, particularly at road and highway crossings, can often perform double-duty by promoting connectivity for non-fish species, including terrestrial as well as aquatic animals. Sometimes this may require design modifications such as dry benches, as the draft SWAP notes, but even culverts and bridges designed to meet criteria for full fish passage are likely to help provide habitat connectivity for at least some other species.

4. WaterWatch supports and appreciates the emphasis and comprehensive discussion in the draft SWAP on **fish screening** to keep fish in their natural habitats instead of becoming lost or trapped in diversion works. This is a simple and obvious way to protect and restore fish populations, with little to no downside other than financial costs.

5. The SWAP should do a better job of addressing the causes and effects, and inadequate regulation, of **water pollution from "nonpoint" sources**, including runoff from irrigated fields, animal agriculture, and destruction of riparian vegetation that, among other things, could provide much needed shade to moderate excessive water temperatures. For example, in the section on Key Conservation Issues, lines 3792-95, the discussion regarding the relationship between nonpoint sources of water pollution and **Total Maximum Daily Loads** (TMDLs) is not, in our view, accurate or complete. The discussion suggests nonpoint sources are similar to "background" sources that are not intended to be regulated under a TMDL. In fact, TMDLs typically assign a "load allocation" to nonpoint sources with an intention that actual pollution from nonpoint sources be limited to the load allocation, which is typically much lower than the current contributions of nonpoint sources to water pollution, at least with respect to bacteria, nutrients and temperature/heat. Moreover, the discussion regarding TMDLs and nonpoint sources should reflect that Oregon has been largely unsuccessful in controlling nonpoint source pollution to the extent necessary for meeting water quality standards. Load allocations in TMDLs for nonpoint sources are generally not met, and there has been little progress toward meeting them.

6. The **goals and action items** in the draft SWAP are generally good, but there is little in the way of commitment to specific, measurable actions that will be undertaken to protect and restore Oregon's fish and wildlife. We recognize that the plan is not a regulatory document and cannot compel action by other individuals, entities or agencies, but it could include some specific commitments to action by ODFW, such as how the agency will approach enforcement of existing laws and regulations and how it will approach the comments it makes on applications pending before other agencies.

Thank you for considering our comments.

Sincerely,

Brian Posewitz

Brian Posewitz
Staff Attorney

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, July 31, 2025 3:32 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#845]

Are you an Oregon resident? Yes

Email lclark@NCASI.org

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

SWAP Ecoregions:

The National Council for Air and Stream Improvement, Inc. (NCASI) serves forest landowners, managers, and the forest products sector as a center of excellence for providing technical information and rigorous scientific research needed to achieve the sector's environmental goals and principles, including species conservations. NCASI (http://www.ncasi.org) has a long history of research investigating habitat relationships of forest-associated species and has collaborated with state and federal agencies,

universities, and others on studies investigating the biology of aquatic organisms in managed forest settings. Additionally, NCASI is interested in developing cost-effective measures for forest landowners when conserving species.

COAST RANGE

Limiting Factor: Water

CMP Direct Threats 7.2, 11.4

Lines 531-534

This statement is not supported by current scientific data for forest practices, and in this general statement ODFW ignores the industry's, conservation community's and state's recent efforts to update rules related to forest harvest on steep slopes that have only been in effect since January 2024. This statement directly counters statements made by ODFW elsewhere in the "Key Conservation Issues" pdf lines 3199-3200 where it states:

"These voluntary updates will limit adverse effects of sedimentation and turbidity to surface waters and represent a

success story for productive partnership in limiting pollutant impacts to fish, wildlife, and habitats. 3201 [LINK to Water Quality KCI]."

•Recent studies conducted within Oregon's Coast Range have shown contemporary forest practices limit stream sediment input (Arismendi et al. 2017; Hatten et al. 2018). In the Trask watershed in coastal Oregon, Arismendi et al. (2017) found negligible increases in suspended sediment concentrations and turbidity below road crossings with the greatest increase in suspended sediment concentration observed in the reference watershed. The Alsea watershed revisited (Hatten et al. 2018) directly compared suspended sediment concentrations before and after contemporary harvest with concentrations measured prior to any historical harvest by using the same paired watersheds that were evaluated in the original Alsea watershed study (initiated in 1958). There was no evidence that contemporary harvesting affected suspended sediment concentrations or yields, which were similar to historical, pre-treatment levels (Hatten et al. 2018).

•Since these studies were implemented, as part of the Private Forest Accord, Oregon Department of Forestry has further modified rules for harvesting on steep slopes to specifically limit sediment to streams (in effect since January 1, 2024; https://www.oregon.gov/odf/pages/private-forest-accord.aspx), as well as further enhanced the width and prescriptions of riparian buffers. As part of the steep slope rulemaking updated maps of steep slope areas including: designated debris flow traversal areas and designated sediment source areas were mapped. While results from recent paired watershed studies found harvesting in Oregon's coast range did not increase sediment in streams, more stringent rules and updated mapping also have been put in place to limit sediment affecting streams. Collectively results from prior studies that found harvest practices did not increase stream sediment, and rulemaking that went into effect in 2024

Limiting Factor: Habitat Fragmentation

CMP Direct Threats 1, 2.1, 2.3, 3.3, 8.1

Lines 550-551

Sustainable forest management results in a dynamic landscape. Forest management creates short-term changes to discrete locations within a larger landscape. Ample research documents the numerous species that utilize early-seral vegetation types (i.e., younger forests). A mosaic of forest age classes across a landscape often contributes positively to biodiversity. Often, the highest species diversity in productive/managed forests occurs in the open canopy stages (Verschuyl et al. 2008, see also McWethy et al. 2010, Swanson et al. 2014).

Additionally, Oregon forest practices rules set standards for retention of trees/snags and logs per acre, which helps to maintain a diversity of structural components on the landscape.

Verschuyl, J.P., A.J. Hansen, D.B. McWethy, R. Sallabanks, and R.L. Hutto. 2008. Is the effect of forest structure on bird

diversity modified by forest productivity? Ecological Applications 18(5):1155-1170.

McWethy, D.B., A.J. Hansen, and J.P. Verschuyl. 2010. Bird response to disturbance varies with forest productivity in the northwestern United States. Landscape Ecology 25:533-549.

Swanson, M.E., N.M. Studevant, J.L. Campbell, and D.C. Donato. 2014. Biological associates of early-seral pre-forest in the Pacific Northwest. Forest Ecology and Management 324:160-171.

BORISCH Roxann B * ODFW

From: Brian Posewitz <brian@humanevotersoregon.org>
Sent: Thursday, July 31, 2025 4:30 PM
To: OCS Revision * ODFW
Cc: ECKRICH Carolyn A * ODFW
Subject: Comments of Humane Voters Oregon on draft SWAP
Attachments: 250731 Comments on draft SWAP (2025) - Humane Voters Oregon.pdf

Greetings,

Please see the attached public comments of Humane Voters Oregon on the draft State Wildlife Action Plan. Thank you.

Regards,

Brian Posewitz
Director
Humane Voters Oregon | 5331 SW Macadam Ave., Ste. 258 (PMB 624) | Portland, Oregon 97202
Phone: 503-946-1534
Email: brian@humanevotersoregon.org | Website: www.humanevotersoregon.org
Facebook: www.facebook.com/humanevotersoregon.org

HUMANE VOTERS | OREGON

HUMANE VOTERS | OREGON

July 31, 2025

Carolyn A. Eckrich
SWAP Revision Coordinator
Oregon Dept. of Fish and Wildlife
Carolyn.A.Eckrich@odfw.oregon.gov

Re: Comments on Draft State Wildlife Action Plan

Dear Ms. Eckrich and SWAP Revision Team:

Thank you for the opportunity to comment on the draft State Wildlife Action Plan (SWAP). Humane Voters Oregon offers the following comments:[1]

1. Humane Voters would have appreciated a longer, more robust **public comment process** on a full draft of the SWAP. According to our records, a draft of the full SWAP was not released for public comment until July 11, 2025, allowing only 20 days for public comment. Moreover, our understanding is that ODFW intends to seek Commission approval of the plan at its August 15, 2025, meeting, which suggests little opportunity for public comment to significantly impact the final product. We recognize that the public comment period is part of a longer process of community engagement and technical review, but many individuals and groups – particularly those who care deeply about Oregon's fish and wildlife but lack relevant technical expertise and/or experience – likely waited to see a complete draft of the SWAP before seeking to engage in the SWAP revision process. Given the limited time to review and comment on the full plan, our comments are necessarily general and limited, without limitation as to future comments we may make, and/or positions it may take, with respect to matters addressed by, or omitted from, the SWAP.

2. We appreciate and support that the SWAP considers the needs of **all fish and wildlife in Oregon**, and seeks to protect the most vulnerable, without regard to whether the animals provide a "game" opportunity for hunters and anglers. As you know, a large majority of Oregon's population (approximately 80 percent) does not hunt or fish. Many of the people in that majority nevertheless appreciate and care deeply about fish and wildlife in Oregon and want them protected, restored and treated humanely.

3. We appreciate the thorough discussion of the **Key Conservation Issues** facing Oregon's fish and wildlife. We found it robust and comprehensive, particularly with respect to

[1] Humane Voters Oregon is also a member of the Oregon Wildlife Coalition and supports the comments submitted by the coalition.

wildlife connectivity (barriers to animal movement), climate change and land use changes.

4. The Key Conservation Issues should include more discussion, including goals and action items, regarding management of **human-wildlife conflict** and the need to promote living with wildlife instead of lethal control strategies. These issues are increasingly important as Oregon's population grows, the human "footprint" expands, and the potential for human-wildlife conflict increases.

5. The Key Conservation Issues should include more discussion, including goals and action items, regarding the impacts of **fishing, hunting, trapping, hounding and holding**. While legal with respect to many species, these activities have significant impacts on both targeted and non-targeted species. Those impacts should be analyzed.

6. The Key Conservation Issues should include more discussion regarding the impacts of **poaching and other illegal removal of animals from the wild** (such as illegal wildlife holding).

7. The Conservation Toolbox should include measures and outreach to promote living with wildlife and addressing **human-wildlife conflict** with nonlethal solutions.

8. The discussions on **nonnative species** (invasive and otherwise) should consider the extent to which climate change and human activity make some changes in species' ranges inevitable such that control may not be reasonable or practical.

9. The **goals and action items** in the draft SWAP are generally good, but there is little in the way of commitment to specific, measurable actions that will be undertaken to protect and restore Oregon's fish and wildlife. We recognize that the plan is not a regulatory document and cannot compel action by other individuals, entities or agencies, but it could include some specific commitments to action by ODFW, such as how the agency will approach enforcement of existing laws and regulations and how it will approach the comments it makes on applications pending before other agencies.

Thank you for considering our comments.

Sincerely,

Brian Posewitz

Brian Posewitz
Director

8508 SE 11th Ave. | Portland, OR 97202 | (503) 946-1534
info@humanevotersoregon.org | humanevotersoregon.org

Cafferata CONSULTING

July 31, 2025

Carolyn A. Eckrich
SWAP Revision Coordinator Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR97302

Sent Via email: Carolyn.A.Eckrich@odfw.oregon.gov and OCS.Revision@odfw.oregon.gov

RE: Oregon's State Wildlife Action Plan and Conservation Opportunity Area Boundaries 2025 Revisions

Ms. Eckrich and the State Wildlife Action Plan Revision Team:

Thank you for the opportunity to provide comments regarding the revisions to Oregon's State Wildlife Action Plan and Conservation Opportunity Area Boundary Mapping. I am a consulting Certified Wildlife Biologist® and the owner of a small wildlife consulting firm based in Scappoose, Oregon. The focus of my work is to assist large and small landowners manage their lands with intentional actions for wildlife. In addition, my family owns and manages forest land in Lane, Benton, and Lincoln Counties. I have over 20 years of experience managing wildlife in forested ecosystems. I'm a Past President of the Oregon Chapter of The Wildlife Society and past Chair of the Oregon Society of American Foresters – and a current member of both. Being active in both societies allows me the opportunity to help wildlife and forestry professionals communicate and discuss common goals.

My entire professional career focuses on working with landowners to promote intentional wildlife management. Much of my work is developing and implementing biodiversity management plans for private forest management companies. Through this effort I work with companies who own working forests extending throughout western Oregon. In addition, I am the contract wildlife biologist for the Oregon Forest Resources Institute where I develop content for the Wildlife in Managed Forests Program. I have been using the Oregon Conservation Strategy in my work since it was first developed in 2006.

I offer the following comments for your consideration:

1. In the Conservation Toolbox: Goals and Actions for State, Local, Tribal, and Federal Governments, Nonprofits, and Community-based organizations to engage all Oregonians (starts on line 848), I suggest listing the Oregon Forest Resources Institute (OFRI) as a partner in the paragraph starting on line 863. OFRI's Wildlife in Managed Forests Program

provides guidance to land managers in Oregon on ways to incorporate actions to promote wildlife in working forests.

In the section on education starting on line 920, there are resources listed. I suggest adding knowyourforest.org as a resource. In addition, I would add Oregonforests.org. Both sites contain important information for landowners and managers interested in supporting wildlife on their property.

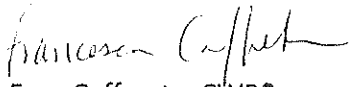
In the section starting on 1511, I would like to see the Sustainable Forestry Initiative listed as well as the Oregon Small Woodlands Association and the American Tree Farm System. All of these organizations promote the mission of sustainably managed working forests and include voluntary actions for wildlife. Many private landowners are either members of or are certified by these organizations which demonstrates commitment to stewarding wildlife in Oregon.

2. The polygons included in the *Draft 2025 COAs* dataset have extensive overlap with private ownership including the forest management companies that I work with. I understand that the mapping effort purposely disregarded ownership to highlight the importance of a landscape approach to conservation and connectivity. However, the review of these boundaries was conducted by ODFW staff. I think a broader review, including representatives from the original Stakeholder Advisory Committee would have provided a more collaborative outcome to the mapping updates. At a minimum, including representatives from the lands that were included in the mapping seems appropriate.

3. As a user of the Oregon Conservation Strategy (now SWAP), I am excited for this update. I use this program to focus efforts on wildlife habitat management to have the maximum positive benefit for wildlife in the state. I have developed wildlife management plans that are being implemented on working forests throughout all of western Oregon and the state wildlife action plan is incorporated into this work. I do this with private forest management and family-owned forest management companies who believe strongly in being stewards of the lands they manage. I think a broader engagement of the forest management community in the SWAP update process would lead to a better understanding of current conservation efforts in the state, increase awareness of the SWAP, and ultimately support better outcomes for Oregon's wildlife.

Thank you for the opportunity to comment.

Sincerely,



Fran Cafferata, CWB®
Cafferata Consulting, LLC
Oregon Small Woodland Owner

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, July 31, 2025 4:58 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#852]

Are you an Oregon resident?	Yes
Email	jane.rombouts@dsl.oregon.gov
	• By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.
Please provide your comments on the specific topic(s) in the space below:	Would it be appropriate to include a bit about Populus tremuloides / Carex obnupta Swamp Forest in 'Aspen Woodlands' habitat description? https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.683642/Populus_tremuloides_-_Carex_obnupta_Swamp_Forest Although the NatureServe states only 1 record, DSL has located another. It's likely there are others, if they were areas that people started to notice.

BORISCH Roxann B * ODFW

From: Seth Barnes <seth@ofic.com>
Sent: Thursday, July 31, 2025 5:13 PM
To: OCS Revision * ODFW
Subject: OFIC comments on the draft State Wildlife Action Plan Revision
Attachments: OFIC Comments_Draft State Wildlife Action Plan Revision_7-31-25.pdf

See our comments attached.

Thank you for the opportunity to provide feedback.

Seth Barnes
Director of Forest Policy | Oregon Forest Industries Council
Phone: (503) 779-4509 | www.ofic.com

OREGON FOREST
INDUSTRIES COUNCIL
SUSTAINABILITY. SCIENCE. INNOVATION. GROWTH.

1149 Court St NE
Salem, Oregon 97301
(503) 371-2942
www.ofic.com

July 31, 2025

Submitted electronically via: OCS.Revision@ODFW.Oregon.gov

Attn: Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302

RE: **Draft State Wildlife Action Plan Revision**

Dear Oregon Department of Fish and Wildlife,

Thank you for the opportunity to provide feedback on the Draft State Wildlife Action Plan Revision (draft action plan). The Oregon Forest Industries Council (OFIC) is a statewide trade association representing large private forest landowners and wood products manufacturers in Oregon. OFIC's core mission is to advocate on behalf of its members to maintain a positive, stable business operating environment for Oregon's forest products community that fosters long-term investments in healthy forests; to ensure a reliable timber supply from Oregon's public and private forestlands; and to promote stewardship and sustainable management of forestlands that protect environmental values and maintain productive uses on all forestlands.

We are writing to provide comments regarding concerns with the process this draft action plan has taken in its creation, as well as feedback on the action plan itself. We recognize and support the important role the Oregon Department of Fish and Wildlife (ODFW) has in supporting healthy fish and Wildlife, and we remain committed to working closely with the Department to fulfill that mission. In the spirit of that commitment we offer the following comments and feedback.

1. **Private landowners input should have been a higher priority during this process, we regret the missed opportunity for better collaboration.** OFIC values our working relationship with ODFW staff in myriad programs throughout the agency. These relationships are key since twenty-two percent of the state's forestlands are owned by large private landowners, including habitat for numerous fish and wildlife species. OFIC strives to stay actively engaged in the work of the Department, from staff updates, to rule changes, program changes, survey efforts, guidance workgroups, and so many other important efforts. As mentioned, OFIC represents a large percentage of the forest land base in Oregon, yet our staff consists of only 6 people, thus we rely on the agency to help us identify priorities so we can appropriately represent our members in important efforts such as an update to the State's Wildlife Action Plan. With that in mind, I am disappointed that our input was not sought after with greater effort. An email search uncovered a single agency invitation to participate in a kickoff meeting. The email was dated December 30th, 2024- a week prior to the actual meeting. The week between Christmas and New Years is often one that includes vacation time and family time, that was certainly true for me. That said, the email was discovered, but the

lack of lead time resulted in thin coverage from landowners. Thus OFIC did not attend that kickoff meeting and did not get our names on the apparent list of people and organizations desiring to participate in the process. I am disappointed that staff, when seeing our names and our organization absent from the process, did not recognize a need for further outreach. Indeed, it wasn't until this draft was complete and a formal comment period opened, that I received another notice for input. The previous update of this plan, in 2015, included multiple in-person meetings where OFIC and other groups representing private landowners (Farm Bureau, Cattleman Association, Small Woodlands, etc.) were in regular attendance and provided robust, real-time, feedback. Sadly, this was a missed opportunity, and OFIC hopes that in future updates landowner input during the process will be a higher priority.

2. **The draft action plan needs to speak to the value of keeping working forestlands working throughout the state.** Line 630 of the draft action plan (page 23) includes a paragraph that alludes to working lands providing high quality habitat for native species. OFIC appreciates this recognition and strongly agrees. That said, this section should go on to discuss the importance of incentivizing landowners to keep forests as forests, and the need for state and federal regulators to recognize the need to work closely with landowners to reduce, or at a minimum does not increase, regulatory or monetary disincentives to keeping working forestlands as working forestlands. The alternative, of course, is transitioning forests to other land uses that do not provide the same level of quality habitat for fish and wildlife. This can be seen as forest lands get converted to other uses such as subdivisions, warehouses, solar panel fields, vineyards, etc. Maintaining working forestlands in Oregon should be a key strategy enumerated throughout the document as so many species depend on these habitats, that are so often provided by large and small private forestland owners.

3. **The list of partner organizations must include vital landowner groups and other supporting organizations.** Glaringly absent from the list that starts on page 49 of the draft action plan are groups associated with private landowners. This list should include OFIC, as the organization that directly represents twenty-two percent of Oregon's' forestland and serves as a principal representative of the Private Forest Accord within the ODFW PFA Grant program, the Oregon Department of Forestry's Adaptive Management Program, the OSU Fish and Wildlife Habitat in Managed Forests Program and so many others. OFIC plays a vital role as partners in securing and directing funding from landowners, the legislature, grant programs, and others towards the study, practice, and direct implementation of conservation in Oregon. In a similar vein, the Oregon Small Woodlands Association, Oregon Tree Farm System, the Oregon Forest Resources Institute, and Oregonians for Food and Shelter should also be listed in this section as partners in conservation.

4. **The plan needs to include recognition of the monumental contributions to conservation being provided through the Oregon Private Forest Accord (PFA).** Line 1203 includes a paragraph noting the importance and value of the PFA Grant Program but fails to discuss the importance of the PFA itself. The PFA was designed to provide exceptional habitat for aquatic species, and additional benefits for upland species including birds and small mammals. The PFA represents a generational shift in forestry operations in Oregon and cannot be

underscored enough in a document such as this. To leave it completely unmentioned is an egregious omission. The PFA represents thousands of protected acres throughout the state on private forest lands, targeting protection primarily for aquatic obligate species; including local and anadromous fish, salamanders, frogs, etc., the PFA also includes explicit protections for beaver (Castor canadensis), and additional benefits to innumerous other species. OFIC strongly encourages staff to include additional language throughout this draft action plan recognizing and explaining the importance of PFA implementation for the benefit of Oregon's fish and wildlife species. Coupled with the comment above regarding keeping working forests as forests, the synergy of working forests that are applying the PFA protections will ensure robust and healthy habitat on forest lands in Oregon.

5. **The plan should describe the contribution to conservation that results from the State's Forest Products Harvest Tax.** The Forest Products Harvest Tax applies to timber harvested in Oregon, and provides key contributions to the conservation of species on forestlands in Oregon. The funds are distributed to programs directly benefiting species conservation, including the ODFW PFA grant program, implementation of the Forest Practices Program, dollars devoted to the study of fish and wildlife habitat in working forestlands at Oregon State University, and funding that directly supports conservation educational materials developed by the Oregon Forest Resources Institute. Created by the Oregon Legislature, each of these programs provide unique and important contributions to conservation that would not be possible without the funding from harvested wood products, a stellar example of working forests providing opportunities for conservation in Oregon.

OFIC values our working relationship with ODFW- a vital relationship given our members important role in providing habitat across twenty-two percent of Oregon's forestlands. OFIC needs our partners in state government to help us know where and when to engage in issues. With so many agencies, so many processes, and so much to track with limited staff, it is vital that agencies help facilitate that involvement. OFIC appreciates the opportunity to offer these comments on behalf of our members for ways that this process, and this draft action plan can be improved to better reflect protections and priorities for Oregon's fish and wildlife species.

Sincerely,

Seth A Barnes
OFIC Director of Forest Policy

BORISCH Roxann B * ODFW

From: Wufoo <no-reply@wufoo.com>
Sent: Thursday, July 31, 2025 6:00 PM
To: OCS Revision * ODFW
Subject: State Wildlife Action Plan Revision Comment Form [#854]

Are you an Oregon resident? Yes

Email jane.rombouts@dsl.oregon.gov

- By checking this box, I understand that I am agreeing to receive email messages about the SWAP Revision at the email address listed above.

Please provide your comments on the specific topic(s) in the space below:

Probably too late for this SWAP update, but would ODFW be interested in working with DSL to have more alignment with descriptions of wetlands? Specifically our Aquatic Resources of Special Concern (ARSC) with descriptions in your Wetlands Habitat descriptions and in the Specialized and Local Habitat descriptions.

ARSCs are described in our Removal Fill Guide, Appendix F

https://www.oregon.gov/dsl/wetlands-waters/Documents/Removal_Fill_Guide.pdf

Additional permitting requirements are required for impacts to ARSCs.

PUBLIC CORRESPONDENCE: July 15, 2025 to July 31, 2025

Date Created	Email	Please provide your comments on the specific topic(s) in the space below:
	142 People Submitted this Letter	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea otter recovery. Reintroduction would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. Oregon historically served as a mixing zone for these two subspecies, and restoring this connectivity would benefit the entire species. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thank you!

	384 People Submitted this Letter	As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity.
2025-07-15 12:35:03 -0800	cheryl_strong@fws.gov	COASTAL DUNES line 30: note that the Siuslaw hairy-necked tiger beetle has recently been found by the USFWS to not be a genetically distinct subspecies. Report will be out in the next few months.line 36 hybridization with another non-native invasive grass: Ammophila breviligulata, American beachgrassline 37 native encroachment by shore pine and other species is also a major issueline 56 especially off leash dogs which are prone to chasing birds on the beachline 73 how does this correlate with the 90% loss (which I think is accurate) listed above in line 24?
2025-07-18 07:33:37 -0800	geologyfan11@yahoo.com	Possibly including Oregon Shores Conservation Coalition as a Citizen Science venue for volunteers to monitor Oregon's coastline, under CoastWatch. https://oregonshores.org/programs-campaigns/coastwatch/ Also, Elakha Alliance is a new organization looking for volunteers. https://www.elakhaalliance.org/get-involved/volunteer/
2025-07-18 14:55:08 -0800	lcarranza@cnlm.org	It seems as though the Yellow-breasted chat (Icteria virens) and acorn woodpecker (Melanerpes formicivorus) are not SGCN in the draft 2025 SWAP. However, they are both identified on the ODFW Sensitive species list. Acorn woodpecker is identified as Sensitive in KM, WV and Yellow-breasted chat is identified as Sensitive-Critical in KM, WV. Is it your intention to not include these species as a SGCN?

2025-07-22 10:49:33 -0800	jyunker@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. By the way, seeing how otters have increased tourism in California I see this is another great way to improve tourism to our lovely Oregon coastline, particularly the southern region. John Yunker
2025-07-22 10:49:48 -0800	nicolecous@gmail.com	Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Please put in place actionable commitments to bring these vital mammals back to our ecosytems. Thank you
2025-07-22 10:50:20 -0800	rosemaryhc@yahoo.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation.Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes.Sea otters are so important for our kelp beds and the health of the ocean. Please make sure that specific provisions for their recovery are included in this plan!
2025-07-22 10:50:32 -0800	ejezuit@uoregon.edu	Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. We know that reintroduction has worked well in other regions outside of Oregon and with the proper knowledge/research a reintroduction event can be successful in Oregon as well and is necessary for supporting this critical species and populations on our coast and more importantly, our planet!
2025-07-22 10:51:09 -0800	sean.sweat@gmail.com	It is good that it appears we are moving toward listing sea otters as a Species of Greatest Conservation Need in the revised SWAP. But the draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation.
2025-07-22 10:53:30 -0800	jimshunt@yahoo.com	Hello, As an Oregonian, and one who has lived on the West Coast into Alaska most of my life, Istrongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thank you, Jim Hunt, Florence, OR

2025-07-22 10:54:26 -0800	tmobilnitamara@gmail.com	Please protect the sea otters. I enjoy going to the Oregon coast and I would love to see the sea otters near the ocean. I know that the sea otters were hunted in the past and that they were almost decimated. Thank you.
2025-07-22 10:55:24 -0800	madmanw@aol.com	We need to partner with organizations like the Elahka alliance to help bring sea Otters back to the Oregon coast for the benefit of our coastal ecosystem and to help increase genetic diversity of the southern sea otters.
2025-07-22 10:56:07 -0800	rebel-dreamer@hotmail.com	We need to reintroduce sea otters to the Oregon coast. This keystone species would help us manage sea urchin populations, restore kelp forests, and boost our economy via tourist dollars. Urchin barrens threaten the health of vital habitat and our fisheries. Kelp forests provide critical habit for a variety of species, from rockfish to whales, and generate oxygen while storing carbon. A plan to reintroduce sea otters, a species lost to the fur trade, makes ecological and economic sense and leaves a legacy for future generations of Oregonians.
2025-07-22 10:57:15 -0800	brandonjquinn@gmail.com	Thank you for listing sea otters as a species of greatest conservation need in the SWAP revision. I would love to also see recommended conservation actions added to the plan, including sea otter restoration. I believe that sea otters play a hugely important role in coastal ecosystems and I would love to see them reintroduced. Thanks for your time.
2025-07-22 11:05:31 -0800	norwester@garibaldicharters.com	I am against reintroduction of sea otters in Oregon. I feel that the harm to fishing and crabbing is greater than the benefit to anyone. Thank you for your consideration of my comment.
2025-07-22 11:08:22 -0800	ctmc944@yahoo.com	I am writing to express my strong support for listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan. I also encourage the Oregon Department of Fish & Wildlife to modify the draft plan to recommend sea otter reintroduction as a priority Conservation Action. Thank you for considering my view.
2025-07-22 11:11:45 -0800	bratgab2@isu.edu	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. Not only are sea otters a keystone species that helps promote and protects kelp forests -of which Oregon's are shrinking - and eelgrass beds in estuaries, they are and always have been a valued relative of the coastal Native American tribes. Sea otters feature in many traditional stories, and their remains have been found in archaeological sites along the coast. Sea otter pelts are still used as part of ceremonial regalia tribal members wear for dancing and ceremony. There is precedence of the success of reintroducing sea otters into their once native habitats, in our neighboring states of California and Washington. Researchers, non-profits, and tribes are working together to do their part on bringing the sea otters back to Oregon, but including sea otters into ODFW's SWAP would bolster their efforts and pave the way for a successful, timely reintroduction to our coasts. Thank you for your time and consideration.

2025-07-22 11:12:16 -0800	lcweymouth@peak.org	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). However, the draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation.
2025-07-22 11:12:23 -0800	ardyhne@gmail.com	The SWAP should include conservation actions related to the return of sea otters to the Oregon coast. Although the previous SWAP included sea otters as a Species of Greatest Conservation Need, the document included no information or actions that would support the return and protection of this iconic keystone species. Various organizations, Tribal entities, and coastal communities would appreciate the development and inclusion of Conservation Actions in the SWAP that would advance sea otter reintroduction and management of sea otters.
2025-07-22 11:12:29 -0800	caroline.bowles@gmail.com	Please include sea otters in your SWAP. They are a native, keystone species that will help restore and maintain our kelp forests. Thank you!
2025-07-22 11:15:12 -0800	zoocuttinga@gmail.com	Hello there, While I was pleased to se sea otters listed as a Species of Greatest Conservation Need in the plan,I was disappointed to see that there were no specific actions recommended. Reintroduction is feasible and would improve ecosystems health in nearshore kelp beds and eelgrass in estuaries. Of course, it would also improve resilience of the species on the west coast, improving genetic diversity, as well as habitat diversity and a more stable geographic distribution. It is also important to remember that they are of cultural importance to coastal native American communities in our state. I would like to see ODFW include reintroduction of sea otters as a priority Conservation Action in the updated sea otter species profile. Amy Cutting
2025-07-22 11:15:38 -0800		Please help to safeguard and enhance our national coastlines for future generations.
2025-07-22 11:17:19 -0800	tbmcleish13@gmail.com	I'm the author of a book about sea otters, Return of the Sea Otter, which outlined the history of sea otter conservation and their recovery in most of their range. But as you know, that recovery has not succeeded here in Oregon. So I was pleased to see that sea otters have been listed as a species of great conservation need in the SWAP. But the plan has no conservation actions listed to aid their recovery in Oregon. It should, therefore, be amended to add appropriate actions, especially the initiation of sea otter introductions on the Oregon coast. Reintroductions are a proven strategy; sea otters are a keystone species that will benefit the nearshore ecosystem; and they are an important animal in the history and culture of our communities. I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thanks.

2025-07-22 11:23:04 - 0800	kmwifish@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Please take this opportunity to help them, Kim Wilbur, Roseburg, OR
2025-07-22 11:29:49 - 0800	hbetsyann@gmail.com	Sea otters will eat sea urchins which will restore the kelp forests and help to return the oceans to a healthy balance.
2025-07-22 11:31:41 - 0800	jackiejjj@hotmail.com	I'm very pleased to see sea otters listed as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The plan should also recommend Conservation Actions, including sea otter reintroduction. Reintroduction is a proven successful strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. Oregon's coastline is a critical gap in the sea otter's range. Reintroduction would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. It would also benefit our coastal communities by improving eelgrass in estuaries, helping to mitigate flood damage and providing nurseries for young fish and seafood - benefiting our fishing industry. Thank you!
2025-07-22 11:39:21 - 0800	bkloos@sbcglobal.net	The otters were reintroduced to the coastal area. They had been there, minding their own business until they were hunted nearly to extinction. They deserve a welcome home.
2025-07-22 11:43:42 - 0800	alanmarshallseattle@gmail.com	I regularly sea kayak on the Pacific Coast. There are sea otters in both CA and WA, but not OR. Please help them expeditiously resettle there. Thx!

2025-07-22 11:55:32 - 0800	pennrods@yahoo.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. Thank You Mike Carrier Former Director, Oregon Parks and Recreation Department Former Natural Resources Policy Director, Governor Ted Kulongoski
2025-07-22 11:55:49 - 0800	penguinluvr@att.net	I live in Washington state. But I think it is vital to help otters.
2025-07-22 12:02:10 - 0800	shanahan_kelly@yahoo.com	Studies have shown that a reintroduction of sea otters as a keystone species would greatly benefit the Oregon Coast. Please include a plan to reintroduce sea otters. The Elakha Alliance has the science and support of Oregonians. Thank you, Kelly Shanahan
2025-07-22 12:07:43 - 0800	Bevsmith0618@gmail.com	Those that understand the importance of the Sea Otters to the marine ecosystem have long been awaiting action on bringing Sea Otters back to the Oregon coast. They are vital in controlling the sea urchin population and bringing back balance to the coastal areas of the state, stabilizing and enhancing the kelp beds for many other species to thrive. We have also been concerned with the decreasing whales we have been seeing - and by boosting the kelp forests (by bringing back a key species; the Sea Otter) - we can assist a thriving and diverse ecosystem for the whales and many others in the food chain. Please - we have waiting long enough to bring the Sea Otters back - I understand it is a complex issue and may be a long undertaking - but we must be the "Good Ancestors" to think about the future and bring forward this possibility. Much thanks, Bev Smith, Depoe Bay OR
2025-07-22 12:21:44 - 0800		I support listing sea otters as a Species of Greatest Conservation Need. They are an important species in Oregon and it's important to safeguard them. I urge ODFW to include reintroduction as a priority action. This strategy is highly successful. Thank you for addressing this important issue for all Oregonians. Sincerely, Patricia Goodin
2025-07-22 12:23:52 - 0800	Patricia.goodin77@gmail.com	Add sea otters to the list of species needing immediate assistance. Reintroduce them is a critical action to take. Thank you.
2025-07-22 12:37:12 - 0800	pipyn@pacifier.com	I understand and support your inclusion of sea otters as a species of greatest conservation need, and urge you to also include a plan of action. There are efforts underway to support reintroduction, please include an analysis and plan for bringing sea otters back to the oregon coast

2025-07-22 12:39:22 -0800	time4lori@gmail.com	I wish to express my strong support for listing sea otters as a species of greatest conservation need in the revised State Wildlife Action Plan (SWAP). I also respectfully urge the committee to include specific conservation actions—particularly a sea otter reintroduction strategy—to accompany this designation. Sea otters play a critical role as a keystone species along the Pacific Coast. Their presence enhances the health and productivity of nearshore kelp forests and eelgrass meadows, both of which are essential habitats for a diverse range of marine life. Importantly, by promoting the growth of these underwater ecosystems, sea otters contribute significantly to carbon sequestration efforts, providing a natural tool in the fight against climate change. Their cultural significance to Oregon's coastal Native American tribes further underscores the importance of restoring this species to our waters. Reintroduction is a proven and effective conservation strategy. Approximately 35% of the current global sea otter population stems from successful reintroduction efforts in regions such as Alaska, British Columbia, and Washington. Restoring a population in Oregon would not only enhance genetic diversity by reconnecting northern and southern subspecies but also increase the species' long-term resilience. Historically, Oregon's coast served as a vital mixing zone for these subspecies, and reestablishing this connection would benefit the broader population. Oregon currently represents a critical gap in the sea otter's historical range. Reestablishing sea otters along our coast would create a more stable and geographically diverse distribution, reducing the species' vulnerability to localized threats such as oil spills, disease, and habitat degradation. Given the best available science and the documented success of past reintroduction efforts, I urge the ODFW to prioritize sea otter reintroduction as a key conservation action in the updated species profile. Taking this step would represent a forward-thinking approach to species recovery, ecosystem restoration, and climate resilience. Thank you for your consideration. Sincerely, Lori Richardson
2025-07-22 12:40:16 -0800	mdjhoward.dh@gmail.com	Please include specific plan for supporting sea otter return to Oregon. This is important need for Oregon.
2025-07-22 12:44:40 -0800	elhoward@hotmail.com	The State Wildlife Action Plan should also include funding for another attempt to reintroduce Sea Otters to the Oregon coast. The Sea Otters in the northwest corner of Washington are thriving, perhaps they could spare enough to establish a colony here. Of course, I have my own bias, as I have a beach house close to Bandon Dunes, but I'd like do see them introduced to unpopulated stretches of Coos County or Curry County. Maybe Humbug Mountain State Park?
2025-07-22 12:46:20 -0800	gcollinsworth33@gmail.com	Please pay strict attention to the sea otter reintroduction on the Oregon Coast. Often times we only have one opportunity to reclaim and protect special wildlife that help balance nature. Thank You for putting a sea otter Action Plan at the forefront of wildlife preservation.

2025-07-22 13:12:33 -0800	jsdd51@frontier.com	Please include sea otters in the SWAP! Oregon is a gap in sea otter populations and reintroduction has worked in Alaska, British Columbia and Washington state. I urge ODFW to include reintroduction of sea otters as a priority. Thank you! Jennie Sue Dunn-Dixon
2025-07-22 13:15:21 -0800	smoothsailing@riseup.net	Please request funding to restore sea otters to the Oregon coast. These iconic animals once graced our shored, improved our kelp beds, providing habitat for myriad fish and other creatures. The kelp beds are being devastated by sea urchins through the loss of sea otters and lately sunflower starfish. The ecosystem services provided by sea otters is immeasurable, improving our fisheries, and the tourism industry would also benefit.
2025-07-22 13:15:40 -0800	schenk@crmm.org	In the Species of Greatest Conservation Need, I highly recommend including the recommended Conservation Actions for Sea Otters, which are not only critically endangered along the Oregon coast, but a keystone species. Please protect these incredibly valuable creatures in your action plan.
2025-07-22 13:18:03 -0800	bettynoyes@mac.com	Please save and expand our Sea Otters into Oregon!!!
2025-07-22 13:42:17 -0800	douglasmclain@ymail.com	I just returned from a trip to the north end of Vancouver Island. We saw quite a few sea otters in Quatsino sound. We also saw a lot of kelp forests. Coincident? Not according to the locals. We were told that the otters had been gone for a long time as had the kelp forests. The kelp only returned after the otters did. We need to see that happen in Oregon, and there's no reason that it can't. We just need to spend the time and money. Douglas McLain
2025-07-22 13:42:57 -0800	john.marchwick@gmail.com	As someone who lives close to the Oregon border, I strongly urge Oregon Department of Fish and Wildlife to reintroduce sea otters to the Oregon Coast. In an ever growing threat of climate change, sea otters can help fight against climate change by consuming overpopulated Purple Sea Urchins and therefore increasing Kelp Forest and Seagrass abundance. These habitats not only provide homes for various species of fish and invertebrates as well as marine mammals, kelp forests can absorb up to 4.4 to 8.7 million tons of CO2, which therefore kelp forests can help reduce our carbon footprint. This is something that will help protect Oregonians future in the long term whether it'd be economically through fishing or people traveling to Oregon to see otters increase tourism, but also would help ensure Oregon faces further minimum impacts from Climate Change. https://www.bbc.com/future/article/20210914-how-sea-otters-help-fight-climate-change
2025-07-22 13:44:23 -0800	carsonhuckert@gmail.com	Please reintroduce sea otters to Oregon.
2025-07-22 13:54:27 -0800	sidney.staebler51015@gmail.com	My name is Sidney Stabler and I wanted to take this time to say that I would love for sea otters to be reintroduced to Oregon. I go to Oregon all the time with my fiancée and we would love to go there to see those cute little guys! And if they make ecosystems better I don't think it hurts to try. Nothing stays the same in life, and it is time for change with sea otters. Please bring them back to Oregon and thank you for listening.

2025-07-22 13:57:08 -0800	mklarr8@gmail.com	My name is Melissa Klarr and one of my biggest concerns is Climate Change for my grandchild. I want him to live in the world knowing in my lifetime that in some way I made the world a better place for him and that society made the world a better place for him. I think it would be marvelous to return a species back to its rightful place it once called home. And as a resident who lives near the Oregon border off the coast, I support reintroducing sea otters to Oregon. Thank you for letting me comment.
2025-07-22 14:02:31 -0800	sbruckner615@gmail.com	Sea Otters are a delightfu species that will doubtless be a significant draw for tourist $'s to Oregon. But only if we take significant steps to restore the population Oregon had historically .
2025-07-22 14:25:27 -0800	bsmith@nehalemtel.net	What ever actions the State of Oregon can produce and follow through on in regards to reintroducing sea otters to our Oregon coast should be developed and set into motion. Healthy kelp forests are a necessity for sea otters, so producing such ecosystems is a must, and a good starting place. I hope all concerned entities can get on the same page, and bring a significant otter population back to our coastal waters.
2025-07-22 14:41:44 -0800	looney7@icloud.com	Sea Otters are a keystone species for the health of coastal environments. If we want a healthy kelp forest along the Oregon Coast then we have to reintroduce Sea Otters and engage in active conservation of their population.
2025-07-22 14:54:08 -0800	mlstep453@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation.
2025-07-22 15:11:01 -0800	keklawrence@gmail.com	Please be sure to include provisions for reintroducing sea otters to the Oregon Coast. They are a crucial missing piece to our Oregon Ocean ecosystem! Karen Lawrence
2025-07-22 15:23:38 -0800	lyndellwilken@gmail.com	I am very supportive of classifying sea otters as a keystone species that will improve the over all health of our ocean.
2025-07-22 16:11:54 -0800	patriciaparcells@aol.com	I am pleased that there is mention of Sea Otters in the Wildlife Action Plan, because they are a keystone species that could contribute to the restoration and health of our coastline. However, I don't see any specific actions in the plan. The Elakha Alliance has done a wonderful study about the potential for reintroduction, and this could, with state support, be implemented within as few as five years. Please include steps toward reintroduction in the revised plan.
2025-07-22 16:30:57 -0800	xtalr52@gmail.com	Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Please include these precious and important creatures in your SWAP.
2025-07-22 16:56:36 -0800	dmell3.14159@gmail.com	I understand that sea otters are suggested to be listed as a Species of Greatest Conservation Need in the SWAP revision. Thank you for that. I would also like to suggest that you associate an action for them, namely reintroducing them to Oregon. They lived here historically and there's no reason why they shouldn't live here now. I realize that reintroduction will require a lot of work to be successful, but that's no reason to shy away from it. Thanks for listening.

2025-07-22 17:16:43 - 0800	sedonayoga@yahoo.com	I'm from Northern California, and my husband and I travel to the Monterey area frequently for wildlife watching. it's magical to see wild otters along the Central Coast. Closer to home, our North Coast waters have lost the kelp forests otters need to thrive, and it isn't hard to imagine one or two negative events impacting the population concentrated around Monterey. If we could support additional otter populations outside of California, we'd have better odds of protecting this valuable and charismatic keystone species. Otters are part of a healthy coastal ecosystem--key to its restoration. And they are a huge draw for visitors like me.
2025-07-22 17:38:21 - 0800	meganfowler@yahoo.com	Please incorporate protections and conservation plans for sea otters. They are a vital part of the ecosystem. Thank you.
2025-07-22 20:22:46 - 0800	katielarsell@gmail.com	I have been a supporter of returning Sea Otters to the Oregon Coast for a long time. They are a keystone species and would help maintain kelp on the coast. Please include actions in the Revised Plan that would further the return of Sea Otters. There must be intermediate step that would move this effort forward.
2025-07-22 20:54:50 - 0800	mpwiedlin@att.net	It is my understanding that the draft SWAP has identified sea otters as a Species of Greatest Conservation Need, but has not recommended any Conservation actions for sea otters. In light of the planned reintroduction of sea otters to the Oregon Coast ODFW needs to identify what their role needs to and should be in this effort. While I defer to wildlife experts on the specific appropriate conservation actions for sea otter reintroduction to Oregon, with respect to sea otters the State Wildlife Action Plan does not seem like much of a plan if no conservation actions have been identified.
2025-07-22 21:02:26 - 0800	nmckimens@yahoo.com	Lease can you strengthen the wording to protect sea otters. Let's be optimistic and know that we are creating and maintaining an environment where they once again can survive and thrive
2025-07-23 01:31:02 - 0800	dylana.lockwood3@gmail.com	Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile
2025-07-23 07:55:57 - 0800	wendolynmolk@comcast.net	Please include a plan to reintroduce sea otters to the Oregon coast. They are so important for healthy ecosystems, insuring kelp forest and eel grass community health where they are keystone predators. They keep the urchin population in balance so that the kelp forests don't become kelp barrens, much like clearcuts in old growth forests. Also in the estuaries, they keep animals and plants in balance as the keystone. Both of these communities need our help to thrive because they are homes to young fish and also very old rockfish who in their older age actually produce more young! The populations of sea otters in Alaska are fully recovered. The feasibility studies have been done. It is time to move forward with sea otter reintroduction and have it be a big part of this plan you are writing. The time is now. Thank you.
2025-07-23 08:34:34 - 0800	suey1480@gmail.com	Please include otters in your plan.

2025-07-23 10:16:57 -0800	lucasdodd@fastmail.com	To whom it may concern, Thank you for considering the sea otter in Oregon as a species of greatest concern. Please consider including a plan for conservation actions regarding reintroduction of the sea otter. Sea otters control urchin populations, which in turn allow kelp forests to grow large, fish populations to increase, and therefore fishing yields as well. By reintroducing seaa otters, the health of the coast improves and the local fishing economy benefits. It is a win-win for everyone. I am not an Oregon resident, but I have visited the Oregon coast, and noticed how very little kelp grows there compared to places in California where southern sea otters have successfully repopulated. Bringing back otters to Oregon would benefit commercial fishing, recreational fishing, tourism, and local ecology. Thank you, Lucas Dodd
2025-07-23 16:13:11 -0800	stebbins.emily@gmail.com	Please include sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP).Please also recommend Conservation Actions, including sea otter reintroduction. As a keystone species, sea otters' presence increases the health and diversity of the ecosystems they inhabit. They are also a deeply important species culturally. Thank you!
2025-07-23 16:39:35 -0800	trangodk@gmail.com	I would like to have Sea Otters be re-introduced to the Oregon coastal ecosystem. Currently the sea urchins have multiplied along the coast causing stressors to other tidal plants and fish. Thank You for considering my concerns
2025-07-23 22:46:08 -0800	driftawake@gmail.com	Hello, I am writing to speak for sea otters and salmon- two Keystone species that need extra consideration in this revision. Salmon are the life blood of our region and we need to work as hard as possible to protect our wild runs that still remain and do what we can to strengthen their survival i our blocked and warming, poisoned and overfished waterways. As we know, the unluckiest of species, the coastal sea otter was exterminated long ago. I support every effort to reintroduce this species to our area as our oceans depend on them to balance our ecosystem. Please do not leave them out of your thought process and consider them an important part of our wild and true Oregon.
2025-07-24 01:23:28 -0800	carolcherhoniak@icloud.com	pleas support introducing sea otters to the oregon coast. thank you!!
2025-07-24 08:36:02 -0800	patblueheron@msn.com	Please help reintroduce and protect the sea ottter.
2025-07-24 09:47:51 -0800	ericmeans51@gmail.com	Active reintroduction efforts of sea otters to Oregon coastal waters strikes me as an excellent use of ODFW resources. I strongly encourage ODFW to not just applaud this effort, but to help do something about it. Thank you,
2025-07-24 15:28:35 -0800		The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation.

2025-07-24 15:58:43 -0800	melindamccoy1@aol.com	Sea otters are a known key stone species. By reintroducing sea otters, sea urchins can be brought under control. Sea urchins eat the kelp that young fish need for protection from predators.
2025-07-24 16:36:35 -0800	Greg@GregVaughn.com	Please include sea otter conservation in this plan.
2025-07-24 17:40:23 -0800	shermansparks@gmail.com	Hello I am writing to support Sea Otters as a Species of Greatest Conservation Need in the SWAP plan. I would like to support Sea Otter reintroduction as a recommended Conservation Action of this designation. The fact that Sea Otters are a keystone species which support the health and productivity of kelp beds and marine ecosystems is undeniable. Science has supported this finding, and reintroduction os Sea Otters is a proven strategy that has worked in other locations such as California and Alaska. It is time to bring the Sea Otters home to Oregon! Please listen to all the best available science and include Sea Otter reintroduction as a top priority for ODFW. Thank you for your time. Sherman Sparks
2025-07-25 10:44:16 -0800	kaytata77@gmail.com	Please that conservation wording must be included in any Wildlife Action Plan or revision of such a plan. It is unacceptable to allow protections of wildlife to be excluded just as environmental protections continue to get excluded by our current administration. What about future generations? This is wrong. Thank you. Tanya Maxwell
2025-07-25 12:29:25 -0800	corvi.elizabeth@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. As a keystone species, sea otters promote and protect the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In turn, they provide essential ecosystem services like promoting carbon sequestration and safeguarding our coastlines. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile.
2025-07-25 14:01:40 -0800	debdowah@gmail.com	Please add sea otter conservation, and bringing sea otters back to the state of Oregon as a priority. This will help us with kelp, and more importantly, eating the sea urchins, which destroy so many things.

2025-07-25 14:16:02 -0800	sauronsux@gmail.com	Sea Otters are critical for our nearshore ecosystems and considerations for their species need to be added to your plan. In their absence, our kelp forests stand little to no chance. ~66% of our kelp has disappeared in the last decade. Kelp does not stand a chance for regenerating to adequate population without sea otters and our kelp is vital to our life on land. Not only does kelp sequester carbon (climate change is real), but it provides protection/buffers erosion (think of those oceanfront homes/rentals), provides a habitat for fish and other wildlife (commercial fishing, etc) and supports micro organisms that our ocean needs. Sea otters help in this situation because they eat organisms, like purple sea urchins, that feed on kelp. Sea otters require a lot of food, as they are sea mammals without blubber, to survive and so their presence would very much check this booming urchin population. Sea otters are very much needed and I cannot urge you more to include them in your work here.
2025-07-25 14:25:54 -0800	bernaldezallison@gmail.com	I am so pleased to see that sea otters are listed as a Species of Greatest Conservation Need in the current draft of the revised Oregon State Wildlife Action Plan. I am disappointed, however, to see that the draft plan does not include any recommended Conservation Actions, like sea otter reintroduction to Oregon, to support the designation. Reintroduction is a proven conservation strategy. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. Sea otters are a keystones species because they play an essential role in maintaining ecosystem balance. Studies have shown a kelp forest without sea otters can capture 4.4 megatons of carbon dioxide, whereas a kelp forest with otter protection can capture nearly twice as much at 8.7 megatons. As reported by U.S. Fish & Wildlife Service in 2022: "There is a more than 900-mile gap along the coastline between central California and the west coast of Washington where there still are no sea otters. In the face of a rapidly changing climate, do we have the time to wait for natural recolonization? Restoring sea otters throughout their historical range would give them the greatest chance of surviving climate change, and it would help to sequester carbon and strengthen the resilience of nearshore ecosystems." Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thank you.
2025-07-25 14:50:41 -0800	j.erdman101@gmail.com	Please include Sea Otters in the State Wildlife Action Plan. They are a keystone species and NEED to be taken into consideration in this plan.
2025-07-25 14:53:16 -0800	kajacobson@gmail.com	Thank you for including sea otters on the SWAP plan. We need more including a path for reintroduction for this crucial species. Sea otters are essential for restoring health and balance to the Oregon coast eco systems. They are also adorably cute and will bring tourists to the area and money to our coastal communities. Thank you.
2025-07-25 15:08:36 -0800	shannonelinore@gmail.com	Sea otters are a keystone species that used to live off the Oregon Coast. Since they were nearly hunted to extinction, the sea otters are struggling to return to Oregon. We need sea otters to help restore kelp forests. Sea urchins have devoured many of our kelp forests. We need sea otters back in Oregon to eat the sea urchins and restore balance to our ecosystem.

2025-07-25 15:30:13 -0800	jdaschel@gmail.com	Please add Conservation Actions for sea otters to the State Wildlife Action Plan. With sunflower stars and otters both absent in our nearshore environment, sea urchin populations are going unchecked, resulting in devastating consequences to kelp forests. It's not enough to list sea otters-- it's past time to include ACTION so the species can be restored to Oregon waters. Thank you for your consideration. Joanne Daschel Lincoln City OR
2025-07-25 15:39:41 -0800	jhodder@uoregon.edu	I am pleased to see that ODFW has revised the State Wildlife Action Plan (SWAP) and included listing sea otters as a Species of Greatest Conservation Need. To further support this designation the draft plan should be amended to also recommend Conservation Actions for this species, including sea otter reintroduction to Oregon. Sea otters are a keystone species providing multiple ecological services to the Oregon nearshore and estuaries. Their presence increases biological diversity, ecosystem health and ocean productivity. They also provide carbon sequestration opportunity. The presence of sea otters in Oregon's waters would be a boon to coastal tourism. Sea otters are also of significant importance to the culture of Oregon's coastal Indian tribes. Reintroduction is a proven conservation strategy and a well-established tool in sea otter recovery. Roughly 35% of today's global sea otter populations come from reintroduction efforts in Alaska, British Columbia, and Washington. The lack of sea otters in Oregon is a barrier to the long-term resilience of the species. Reintroduction would restore population connectivity between northern and southern sea otter subspecies and reduce the risk from anthropogenic actions. Scientists and managers have the information needed to undertake a successful effort to restore sea otters to Oregon. It is time to undertake this action and I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Jan Hodder
2025-07-25 15:46:03 -0800	etennis@hotmail.com	As a long time visitor to Oregon shores from Washington State, I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft needs recommendations for conservation actions because of proven positive impacts of sea otters on the overall health of the marine environment. As a keystone species, there is no question that they needed and much cheaper to let them do the work for improving kelp forests than try to do it ourselves.
2025-07-25 15:54:27 -0800	tresa2015taylor@gmail.com	Sea otters should be included.

2025-07-25 16:26:11 -0800	lakersh@lakersh.com	I'm a native Oregonian born in Eugene and am a strong supporter of the Elakha Alliance and other kelp forest related agencies. We are in hard times. With the starfish wasting disease, climate change and loss of keystone animals like the sea otter, the West Coast is in jeopardy of ecosystem imbalance in our oceans. Imaging losing our evergreen forests on land in a similar manner! Please include serious funding for the restoration of sea otters in your legislative efforts. My sentiments are focused on in statements issued by the Elakha Alliance.
2025-07-25 16:46:52 -0800	genny_mrtnz@yahoo.com	Otters should be included in the wildlife action plan. They contribute to the ecosystem and are cute. Thank you.
2025-07-25 17:16:52 -0800	mimismithpdx@gmail.com	I strongly support the reintroduction of sea otters to the Oregon coast. As a keystone species, they are necessary to keep the whole kelp forest ecosystem healthy. Please support their reintroduction!
2025-07-25 17:30:12 -0800	nikaela.perez3@gmail.com	Sea otters are an endangered species & deserve to be cared for!
2025-07-25 18:40:49 -0800	rei7484@gmail.com	Please consider including conservation actions for sea otters. They are still low in population and need conservation actions.
2025-07-26 03:28:42 -0800	jtrue@uoregon.edu	Dear ODFW Staff and Commission Members, I strongly support listing sea otters (Enhydra lutris) as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). However, I am deeply concerned that the draft plan does not include any recommended Conservation Actions to support this critical designation. Given that the SWAP is updated only once per decade and serves as Oregon's primary conservation planning document, this omission represents a significant missed opportunity for species. Sea otters are a keystone species whose ecological impact far exceeds their numbers. Their predation on sea urchins is essential for maintaining healthy kelp forests and eelgrass beds—ecosystems that are among our most powerful allies in fighting climate change. Research demonstrates that healthy kelp forests facilitated by sea otter predation can sequester hundreds of tons of carbon per square kilometer annually. Oregon's purple sea urchin populations have exploded in the absence of sea otters, devastating kelp forests that once thrived along our coast. Sea otter reintroduction would provide a natural, science-based solution to restore these carbon-sequestering ecosystems while building coastal resilience against climate impacts. Reintroduction is not experimental; it is a proven, well-established conservation strategy. Approximately 35% of today's global sea otter populations exist because of successful reintroduction efforts in Alaska, British Columbia, and Washington. These programs demonstrate that sea otter recovery is achievable with proper planning, monitoring, and adaptive management. Oregon should build upon this demonstrated success rather than ignore it. Oregon's coastline represents a critical gap in the sea otter's current range, creating dangerous population isolation between northern and southern sea otter subspecies. Historically, Oregon served as a vital mixing zone for these subspecies, and restoring this connectivity would strengthen genetic diversity and long-term species resilience. Reestablishing a sea otter population in Oregon would reduce catastrophic risks from oil spills, disease outbreaks, and other threats while creating a more stable geographic distribution essential for species-wide persistence.

		Sea otters hold profound cultural importance for Oregon's coastal Tribal nations, who have supported reintroduction efforts and secured federal funding to advance this work. The Confederated Tribes of Siletz Indians recently received a $1.56 million grant from the National Fish and Wildlife Foundation specifically to facilitate sea otter reintroduction research and planning. Tribal leaders from multiple coastal Oregon tribes have written to federal officials calling for reintroduction within the next five years. The SWAP should reflect and support these Indigenous-led conservation efforts. I urge ODFW to include the following Conservation Actions in the sea otter species profile: 1. Prioritize sea otter reintroduction feasibility planning - Develop comprehensive pre-reintroduction studies including habitat suitability assessment, prey availability analysis, and stakeholder engagement. 2. Establish partnerships for reintroduction implementation - Collaborate with coastal Tribal nations, federal agencies, academic institutions, and conservation organizations to develop reintroduction protocols. 3. Develop monitoring and adaptive management frameworks - Create science-based monitoring systems to track reintroduced populations and ecosystem responses. 4. Support habitat restoration and protection - Enhance kelp forest and eelgrass habitat quality to support viable sea otter populations. 5. Facilitate stakeholder engagement and education - Build public understanding and support for sea otter recovery through targeted outreach and education programs. The current SWAP revision represents a once-per-decade opportunity to formally recognize sea otter reintroduction as a state conservation priority. This designation would enhance Oregon's eligibility for federal funding, strengthen partnerships with Tribal nations already advancing this work, and demonstrate Oregon's commitment to ecosystem-based climate adaptation. Given the overwhelming scientific evidence supporting sea otter reintroduction, the proven success of similar efforts elsewhere, the strong support from coastal Tribal nations, and the urgent need for nature-based climate solutions, excluding Conservation Actions for sea otters from the SWAP would be both scientifically indefensible and strategically shortsighted. I respectfully urge ODFW to include sea otter reintroduction as a priority Conservation Action in the updated SWAP. Oregon's marine ecosystems, coastal communities, and climate resilience depend on restoring this keystone species to its historical range. Thank you for your consideration of these comments and your continued commitment to Oregon's wildlife conservation.
2025-07-26 09:04:00 -0800	nhadley892@gmail.com	Being familiar with, and having worked within coastal ecosystems, I encourage ODFW to recommend conservation actions aimed at the reintroduction of sea otters to Oregon waters. I support the revised SWAP's designation. Many factors support an intensive study of reintroduction. Kelp forest health, ell grass recovery, green crab control, as well as establishing genetic connection between northern and southern populations are just a few of the issues. Their role as a keystone species in our marine reserve system would be significant. I hope ODFW will pursue this possibility actively by drawing up suitable actions. Thank you

2025-07-26 10:14:23 -0800	mhrobb@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. I am a former California resident who regularly visited sea otter sanctuaries in the state as well as in Canada and continue to do so. I also make contributions to organizations that support sea otters. I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Such an action would not only increase ecotourism; it would also contribute to the long-term viability of this keystone species and greatly enhance the environmental stability of the Oregon coast.
2025-07-26 13:56:56 -0800	suestillhawk@yahoo.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Successful reintroduction efforts in places like Alaska, British Columbia, and Washington have demonstrated that these efforts are a well-established tool in sea otter population recovery. As a keystone species, the presence of sea otters promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. I feel they would also promote wildlife ecotourism in Oregon.
2025-07-26 16:35:55 -0800	mypleasurepetsitting@yahoo.com	I used to see an take wonderful pleasure in sea Otters, it has been disheartening to see their decline. Please attempt to keep all the studies & hard work that has gone into reintroduction an supporting Sea Otters. Thank you Laurie Kramer
2025-07-26 17:11:07 -0800	brookesing@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). I would also like to see a plan drafted for the urgent reintroduction of sea otters to the Oregon coast. Having witnessed the growth of the sea otter population after reintroduction efforts in Washington, I believe that Oregon is the next step for habitat continuity between Northern and Southern sea otter populations. I believe that sea otters can also help restore critical declining kelp beds along Oregon's coast. The ecosystem is out of balance without sea otters in their historical range, and while some nearshore shallow fisheries could be changed by sea otter feeding, I believe fisheries as a whole will benefit from their strategic reintroduction.
2025-07-26 18:04:03 -0800	oroconliz@gmail.com	Please amend the draft plan to recommend Conservation Actions, including sea otter reintroduction. Sea otters are crucial ocean keystone species. The OR coastline is a critical gap in sea otter's range due to extripation of the species here by humans. The enormous reduction in the kelp forests off our coasts may be reversed by reintroduction of sea otters. Purple sea urchins desperately need another predator species while the Sunflower Sea Stars recover. The reintroduction of sea otters will help with the control of these urchins. Thank you.

2025-07-26 20:02:41 -0800	gretchenstuart@yahoo.com	PLEASE REINTRODUCE SEA OTTERS BEFORE IT'S TOO LATE! Our coastline is warming, acidifying and eroding. Our sea life is disappearing from whales to sea stars. We need healthy kelp forests and seagrass beds to turn this situation around, and we need sea otters for healthy kelp & seagrass. Kelp and seagrass work as nurseries for fish, shellfish, and krill. Sea otters will help secure futures for most fishing industries, whale watching tourism, and reduce coastal erosion. But if we keep putting it off, it will be too late. We've already lost 2/3rds of our kelp forests over the past decade. I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. Let's make it happen! Thank you, GKS
2025-07-26 20:21:50 -0800	deartap@hotmail.com	Sea otters are Keystone species, is conservation is needed to protect them from being threatened. A little steps would change a lot to save our earth !
2025-07-27 09:47:04 -0800	delaney.m2+ordfw@gmail.com	Thanks for including sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). We need to go further and include reintroduction in the plan. Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. Given the best available science and the success of previous efforts, we should include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thanks!
2025-07-27 10:43:03 -0800	brad@oo-nee.com	Reintroduction of sea otters will devastate the commercial urchin fisheries and the threatened abalone recovery. When the otters move into the estuaries the oyster farms will be destroyed. Otters will not eat empty purple urchins. Reintroduction of sea otters makes no sense in Oregon.
2025-07-27 13:36:04 -0800	tiedemanpdx@yahoo.com	Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes.
2025-07-27 15:25:31 -0800	natoomb@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes.

2025-07-27 17:44:57 - 0800	Cool.garvey@gmail.com	I believe reintroducing sea otters to the otegon coast will not accomplish reductions on purple urchins And will also disrupt our fisheries. It will be a big waste of tax payers money. Vote no.
2025-07-27 18:23:55 - 0800	jordonorwig@gmail.com	I strongly support the reintroduction of the Sea Otters to the Oregon Coast. I live in Lincoln City, Oregon.
2025-07-28 09:14:36 - 0800	adriahna.ashard@gmail.com	I am opposed to the reintroduction of sea otters as it would directly affect me and I could possibly lose my job.
2025-07-28 10:38:32 - 0800	HedgehogUrchin@gmail.com	I am a commercial urchin diver and bringing the otters back would be the end of my job
2025-07-28 13:45:00 - 0800	mikehouck@urbangreenspaces.org	I was to see the amount of thought and specific recommendations regarding Climate ADAPTATION. While mitigation (greenhouse gas reduction) is extremely important, too many programs focus almost exclusively on GHG reduction and relatively little, to none on adapting to climate change. I think the report would be enhanced if you provided some on the ground examples. Two I would mention in the urban context is Foster Floodplain on Johnson Creek which is a Portland Bureau of Environmental Services project to reduce flooding and improve floodplain ecological function. The other is at Westmoreland Park in SE Portland where restoration on Crystal Springs Creek created a cold water refugium for salmonids during recent heat domes.
2025-07-28 13:59:49 - 0800	mikehouck@urbangreenspaces.org	Urban is not included Key Habitats or Special Habitats. It has been a general policy of natural resource agencies, planners, and many nonprofit conservation organizations to "write off" the urban environment when issues of conservation "priority" is concerned. I believe strongly that the diversity of fish and wildlife habitats in, for example, the Portland-Vancouver metropolitan region, warrant special "URBAN" focus in the SWAP. I would argue that urban conservation, both for ecological and education of the general public, should be elevated within ODFW and should be addressed as a habitat of concern.

2025-07-28 14:16:38 -0800	mikehouck@urbangreenspaces.org	I was pleased that you called out the fact that Goal 5 is primarily a "process" goal. I was intimately involved in conducting Goal 5 inventories throughout the Portland metropolitan region in the early-to-mid 1980s. My first obstacle was ignorance on the part of local planners. The first county I went to told me "there is no place for nature in the city" and that Goal 5 did not apply in the urban environment. There was great resistance to protecting habitat inside the UGB since that would remove land from the buildable lands inventory. I found there was little appetite on the part of city and county planners to protect urban natural resources. Fortunately, we turned to non-regulatory efforts such as working with public utilities on green infrastructure approaches to addressing requirements under the Clean Water Act along streams and wetlands. Metro's Parks and Nature (Metropolitan Greenspaces Program) which was initiated in the early 1990s has protected over 20,000 acres of natural areas through willing seller acquisitions. I note a HUGE omission in your land use, statewide goals conversation. In the 1990s Metro chose not to focus on Goal 5 when working on its 2040 Growth Managment program and instead focused on Goal 6, water quality and Goal 7 Hazard Lands. Using the combination of those two goals Metro adopted Title 3 which concentrated protection of urban stream corridors for water quality and human health and safety. It was only later in 2006 that Metro adopted Title 13 which was a Goal 5 effort. Unfortunately, those protections were only applied to the highest scoring stream corridors with upland habitats left with "voluntary" protections. Finally, there is a continued conundrum regarding Goal 5 and Goal 9 in the urban context. Goal 9 essentially trumps Goal 5 which is a huge impediment to protecting some of the most important habitat in the urban setting, along our streams and rivers.
2025-07-28 14:32:32 -0800	kimmardav@gmail.com	While sea otters are listed in the draft plan as a Species of Greatest Conservation Need, which identifies the species as a conservation priority, there are no recommended Conservation Actions for sea otters identified. Please remedy this extraordinary oversight to ensure lasting protection and support for future sea otter populations to thrive.
2025-07-28 15:46:34 -0800	mandy@oregonshores.org	Dear Oregon Department of Fish and Wildlife, Thank you for the opportunity to comment on the draft 2025 Oregon State Wildlife Action Plan (SWAP). We celebrate the inclusion of the sea otter (Enhydra lutris) as a Species of Greatest Conservation Need (SGCN). However, the lack of any recommended Conservation Actions for sea otters is a significant omission—especially given their critical role in supporting kelp forests and eelgrass beds, both of which are also identified as Key Habitats and SGCNs. We strongly urge ODFW to include specific Conservation Actions for sea otters in the final SWAP, including support for reintroduction to Oregon's coast. Sea otters are a keystone species whose recovery would advance climate resilience, control invasive species like the European green crab, and restore nearshore ecosystems. In addition, they have an intrinsic right to return—they are a native species that belongs in Oregon's coastal waters. Therefore, they deserve targeted strategies that pave the way for their reintroduction. Thank you for all you do to protect wildlife and for considering these comments. Sincerely, Mandy Watson Coastal Conservation Manager, Oregon Shores

2025-07-28 18:50:26 -0800	mscott1031@hotmail.com	I'm posting to show my support to list sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP) and to ask the plan be amended to include recommended Conservation Actions which include sea otter reintroduction to the Oregon Coast. Sea otters are a keystone species and are needed to provide health and productivity to nearshore kelp beds and estuary eelgrass. This helps reduce the amount of CO2 in our atmosphere by fighting the causes of climate change. Sea otters are also a very important mammal to the culture of Oregon's coastal Indian tribes as well. Roughly 35% of today's global sea otter populations come from places like Alaska, British Columbia, and Washington, where reintroduction efforts have been successful in sea otter recovery. Oregon's coastline is a significant gap in the sea otter's range. Oregon's efforts would help connect the northern and southern sea otter species. This diversity and stability would help support a coastal ecosystem from disturbances like oil spills and disease, create a more balanced geographic distribution and boost the species population. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. I STAND FOR OTTERS !!! Thank you!

2025-07-29 08:48:05 -0800	cherylfcoon@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). But as ODFW and the Commission's legal counsel for ten years (1987-1997), I am dismayed to see that the draft plan does not include any recommended Conservation Actions, particularly sea otter reintroduction to Oregon, to insure that this designation actually means something. There are numerous reasons to list Sea otters -- among them, that their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries and that doing so promotes carbon sequestration and helps fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. The most important strategy should be reintroduction. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea otter recovery. Reintroduction would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. Oregon historically served as a mixing zone for these two subspecies, and restoring this connectivity would benefit the entire species. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. Given the best available science and the success of previous efforts, I urge ODFW and the Commission to include and strongly support reintroduction as a priority Conservation Action in the updated sea otter species profile. Sincerely, Cheryl Coon
2025-07-29 10:38:57 -0800	tatimmins@gmail.com	Please consider adding sea otters to the revised 2025 OR SWAP. Sea otters protect kelp forests and help maintain shoreline ecosystems for many species. The loss of sea otters along the Oregon coast has resulted in an abundance of sea urchin populations which decimate the kelp forests needed for not only sea otters, but whales and other species, to survive.

2025-07-29 13:20:32 -0800	lwvor@lwvor.org	ODFW: SWAP (State Wildlife Action Plan) PLAN LWV National Position: The League of Women Voters of the United States believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical and biological integrity of ecosystems and to protect public health. Same basic strategies for most goals (research, monitor and evaluate, prioritize and implement best practices, partnering) With so much observed, it would be good if words like 'can', 'may', are changed to 'is' and 'will'. It is tenuously written as if the impacts to our landscape and associated wildlife are not out of balance now. Much is written about the collaboration with partners as this plan is an incentive for management. It would be good to have more active education on the components in the plan. Perhaps townhall, school, church, neighborhood association presentations/events to get this information into the hands of the voters. (eg. Mid Willamette Aquatic Weed Partnership Event July 2025, funded by Lottery). 487: The single best conservation measure for maintaining wildlife connectivity in the state would be to protect remaining undeveloped habitat. (Yet we are working to reduce permitting procedures for development in part because of the housing crisis). 2024: 'Invasive species' does not include humans, domestic livestock, or non-harmful exotic organisms. (This definition should change to include humans as the greatest invasive species as section 2616 highlights). 2392: Private landowners are increasingly partnering with watershed councils, ODFW, SWCDs, ODA, and federal land management agencies to manage invasive species across property lines. Such broad-scale efforts need to continue and be expanded. (YES) 2428: Web-based information portals are an important tool for invasive data reporting and sharing. iMap Invasives is an online tool that allows users to report invasive species findings, and provides information on invasive species distribution, treatment efforts and effectiveness, and areas where invasive species were searched for but were not found. The Oregon Invasive Species Council also has an online reporting and sharing tool. iNaturalist, a community based online species identification system and occurrence recording tool, is another resource that can enhance verifiable data collection from the public. (These are incredible hands on resources for the public) With increasing population and economic development, rural landscapes are changing, leading to conflicting uses within and adjacent to fish and wildlife habitat. (and now we are working to reduce permitting process for development) 2831: Technical assistance, such as outreach and education, will be necessary to support local governments and stakeholders to integrate current data. Support and partnerships are necessary, which may involve the creation of toolkits, guidance and training for integrating habitat conservation into development planning and permitting. For example, Oregon would benefit from development of a Green Growth Toolkit (LOVE THIS) to assist communities in implementing conservation actions and proactively planning for growth as development pressures increase. Submitted by the League of Women Voters of Oregon

2025-07-29 14:10:30 - 0800	shervin.hess@oregonzoo.org	RE: Recommendation to Include Sea Otter Reintroduction and Sunflower Sea Star Recovery as Conservation Actions in the 2025 State Wildlife Action Plan On behalf of the Oregon Zoo, I write to urge the inclusion of sea otter (Enhydra lutris) reintroduction and sunflower sea star (Pycnopodia helianthoides) population augmentation as conservation actions in the revised 2025 Oregon State Wildlife Action Plan (SWAP). As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to take proactive steps that restore ecological function and resilience to our nearshore environments. We commend the Oregon Department of Fish and Wildlife for newly designating sea otters as a Species of Greatest Conservation Need (SGCN) and recognizing kelp and eelgrass beds as key habitats. These acknowledgments are a critical step forward. However, without action-oriented recommendations around reintroduction and population recovery for the benefit of both these species and the habitats with which they are intertwined, the plan risks falling short of its stated purpose. The Oregon Zoo has seen firsthand the transformative power of reintroduction as a conservation tool. We've helped restore California condors to their historic range, reestablished Oregon silverspot butterflies in coastal grasslands and advanced recovery of native amphibians and northwestern pond turtles through headstarting. We've also long supported the Elakha Alliance's efforts to explore a science-based reintroduction of sea otters to the Oregon coast. More recently, we've joined the Oregon Kelp Alliance (ORKA) and the broader marine conservation community in exploring a pilot outplanting effort to bolster Pycnopodia numbers and accelerate their recovery. Restoring these top predators offers clear and measurable ecological benefits. Sea otters and sunflower sea stars are both keystone species with well-documented roles in controlling sea urchin populations, thereby protecting kelp forests, a key habitat and SGCN in their own right. Kelp forests and eelgrass beds provide nursery grounds vital for commercial fisheries, food webs and carbon sequestration and structural complexity that keep our nearshore ecosystems resilient. Their loss has cascading effects on biodiversity, fisheries and coastal health. Yet the draft SWAP does not currently acknowledge the absence of sea otters or sunflower sea stars as contributing factors to these habitat declines, nor does it recommend their return as part of the solution. Moreover, Oregon remains the largest unoccupied section of historical sea otter range on the Pacific coast. Without recolonization or reintroduction, the species' long-term resilience remains at risk. Restoring sea otters here would reconnect northern and southern populations, preserve genetic diversity, and buffer the species against catastrophic events in its current fragmented range. According to a 2022 U.S. Fish and Wildlife Service feasibility assessment, reintroducing sea otters would provide significant conservation benefits to the species and to Oregon's nearshore ecosystem. We respectfully recommend that the final SWAP include the following actions: • Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience; • Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to restore trophic balance and protect critical habitats; • Explicitly acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. We are grateful for the Commission's leadership in advancing wildlife conservation in Oregon. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the species and ecosystems that define Oregon's identity. Heidi Rahn Director, Oregon Zoo

2025-07-29 14:59:40 - 0800	popaulianne@duck.com	I had written a long, detailed comment here, thanking you for including sea otters in the SWAP and asking you to please include specific Conservation Actions such as steps to reintroduce them to the Oregon coast (especially Port Orford where I have been since 1993). Sadly, it all vanished in the blink of an eye when a text alert popped up. Port Orford is a long-time fishing village and it is still our main industry today. Our once-thriving ocean environment has become an urchin barrens in many places because there is no check on the purple urchins that decimate every blade of kelp. Sea otters LOVE to eat urchins. Kelp forests create habitat for many species while barrens let nothing live except hibernating urchins. Sea otters are important to Oregon tribes, they keep the urchin population in check so kelp can grow, they are known as a Keystone Species meaning they have a huge beneficial impact. Kelp forests not only create productive ocean areas, they also help to buffer the land from wave erosion. I could say so much more but want to get this sent lest it disappear again. Please revise the SWAP to include Conservation Actions that will support reintroduction and support of sea otters along the Oregon coast. Thank you for your attention.
2025-07-29 17:50:50 - 0800	dgriff1218@outlook.com	Please include Sea Otters in this important revised plan. They are key to many of the ecosystems which exist in our oceans and the Oregon Coast can benefit greatly from restoring otters back to their rightful habitat. Thank you for your consideration. Sincerely, Debra Griffith
2025-07-29 17:52:20 - 0800		As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy.
2025-07-29 17:53:05 - 0800	astrosquires@gmail.com	wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy.
2025-07-29 17:55:59 - 0800	gronos@mac.com	Please include these 2 species in the program.

2025-07-29 17:56:55 - 0800	keklawrence@gmail.com	Please support the addition of sea otters and sunflower sea stars to the SWAP revision. Sincerely, Karen Lawrence
2025-07-29 18:04:25 - 0800	wright6789@gmail.com	Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity
2025-07-29 18:19:48 - 0800	melindamccoy1@aol.com	Due to the importance of Sea otters and sunflower sea stars in protecting our Oregon coast from an over population of sea urchins, I urge you to include them in the 2025 Oregon State Wildlife Management Plan. They eat sea urchins for free thus saving kelp and sea grass to maintain a healthy coast environment.
2025-07-29 18:22:27 - 0800	beachy.keen45@gmail.com	I have a home at the Oregon coast and definitely want to include sea stars and otters - protection of these species is so important!!!!
2025-07-29 18:34:22 - 0800	williamb@orwasubway.com	As a resident committed to protecting our wildlife habitats and a global Coral Farmer who grows Coral across the globe. I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity.

2025-07-29 19:24:08 -0800	ensign.tyler@gmail.com	Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy.
2025-07-29 19:25:50 -0800	denisepcline@gmail.com	I'm nobody important. I just love Oregon and want to keep it healthy and special. Please include the sea otter and sunflower starfish in your Action Plan. It goes without saying that each of these species plays a unique role in our ecosystem. But beyond that, they are unique and beautiful and they bring joy to Oregon residents and visitors alike.
2025-07-29 19:34:56 -0800	kickboxer.chick@gmail.com	The zoo is advocating to include sea otter and sunflower sea star conservation in Oregon's State Wildlife Action Plan. The SWAP is only updated every 10 years so now is your chance to help restore these important species on our coast! As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity.
2025-07-29 19:43:49 -0800	elainenewell@icloud.com	With environmental changes occurring & detrimental effects to sea creatures I wish to stay informed about impacts & path to healthy space for them
2025-07-29 19:58:14 -0800	diane.cc2017@gmail.com	As a concerned resident of the state of Oregon, I am urging you to include restoration of sea otters and sunflower sea stars into the SWAP revision process in 2025. These animals are keystone species; they are essential to preserving our coastal areas. I care about our environment and wildlife. These predatory animals control overpopulation of sea anenomies which are destroying kelp forests,the food and habitat for so many other animals. Please take this important step. Diane Moore

2025-07-29 19:59:50 -0800	pace@lclark.edu	Just supporting the request from the Zoo.
2025-07-29 20:10:17 -0800	linkpatter@gmail.com	Please protect sea otters and other Oregon wildlife in the face of extreme outcomes of climate change.
2025-07-29 20:10:49 -0800	ellaa.rosee.2025@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea otter recovery. It would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. Oregon historically served as a mixing zone for these two subspecies, and restoring this connectivity would benefit the entire species. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thank you!
2025-07-29 20:12:20 -0800	vana@hevanet.com	Sea otters and sea stars are a vital part of our sea ecology and deserve our attention and protection!

2025-07-29 20:17:13 -0800	fores.tio@gmail.com	As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. I've experienced the cycles and patterns of these keystone species firsthand as an avid surfer, kayaker, free-diver, and SCUBA diver who's grown up along the Oregon coast. I've gotten to dive amidst healthy kelp forests. And I've gone diving in the wasteland that is left behind after an urchin population balloons out of control due to a lack of natural predation by species such as sea otters and sunflower stars. Entire swaths of kelp beds get wiped out and ALL the species that depend on that critical ecosystem, which is regarded as a biodiversity hot-spot, suffer and decline in response. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity.

		As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity. As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity.
2025-07-29 20:43:47 -0800	krumet1@gmail.com	

2025-07-29 21:22:37 -0800	kari.schneiderhille@gmail.com	As a concerned resident dedicated to safeguarding Oregon's unique wildlife habitats, I urge you to incorporate the restoration of sea otters and sunflower sea stars into the revised 2025 Oregon State Wildlife Action Plan (SWAP). These keystone species play a critical role in controlling sea urchin populations, which in turn helps preserve vital kelp forests and maintain the overall health of our marine ecosystems. With Oregon facing an escalating biodiversity crisis, the updated SWAP presents a timely opportunity to restore ecological balance and resilience along our coast. To that end, I respectfully recommend the plan include the following priorities: 1. Reintroduce sea otters to Oregon's nearshore and estuarine waters to aid in kelp and eelgrass recovery and bolster climate adaptation efforts. 2. Investigate the recovery of sunflower sea star populations through science-based interventions aimed at protecting essential marine habitats. 3. Recognize the decline of these apex predators as a key factor in the degradation of habitats such as kelp forests and eelgrass beds, and emphasize their restoration as a proactive conservation measure. By embracing these science-driven strategies, the 2025 SWAP can serve as a robust and visionary guide for conserving Oregon's coastal ecosystems and the species that rely on them — while upholding the state's legacy of environmental stewardship.
2025-07-29 21:33:21 -0800	cahason@gmail.com	Sea otters are a powerful long-term solution for ecological resilience and restoration in Oregon, serving as a keystone species. Including them in the State Wildlife Action Plan is a smart and necessary step toward ensuring the future health of our marine ecosystems.
2025-07-29 21:49:11 -0800	lauren.wenner1@gmail.com	Sea otters should be protected and their habitat restored along the Oregon coast for the good of all animals and people that live here.

2025-07-29 22:08:37 -0800	GOEBEL86@msn.com	Regarding the Oregon's State Wildlife Action Plan: Please include restoration of sea otters and sunflower sea stars in the 2025 Action Plan. Sea otters and sunflower sea stars are both keystone species that control sea urchin populations and protect our kelp forests. Kelp forests are vital to a healthy coastal environment. I'm a 4th generation Oregonian and I am truly invested in my home here. And Oregon's piece of the Pacific needs help. Here's what Oregon's Department of Fish and Wildlife SWAP can do to conserve these key habitats: 1. Re-establish sea otters in Oregon's nearshore environments to support kelp and eelgrass restoration. 2. Restore our sunflower sea star populations by protecting those critical habitats. These habitats off our coast need to be conserved to not only restore and protect the species who depend on them but to protect Oregon's identity. Thank you for your time, Elisabeth Goebel Milwaukie, OR
2025-07-29 22:33:56 -0800	seaotterliz@gmail.com	Dear SWAP officials, I write today to request that the restoration of sea otters to our Oregon coastline be added to the new plan revision. Below are some of the ecological benefits of such a restoration, in addition to the tourism and human enjoyment benefits that would be triggered by having sea otters again: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Thank you! Elizabeth Churchill

2025-07-30 03:27:32 -0800	cmc46831@mac.com	Sea otters and sunflower sea stars are both historically native to Oregon, and at least in the case of the sea otter, large numbers were only lost due to direct hunting. Restoring them would be extremely beneficial for the environment, but equally importantly, they are both iconic animals, fascinating to observe and easy to recognize without special training or resources. Oregonians all enjoy seeing whales, even though they are difficult to find. Sea otters and sunflower stars would be much easier for people to see, and would be a beautiful sight along our coast, and greatly enhance our experience of nature. I hope you will therefore, include them in the 2025 State Wildlife Action Plan.
2025-07-30 06:40:27 -0800	oregoncarol@gmail.com	I support efforts to re-establish sea otters in Oregon and also to protect sunflower sea stars. I read that controlling sea urchin populations can protect our vital kelp forests and also that we need to keep eelgrass healthy and as abundant as possible. The 2025 SWAP offers a chance to try to improve our marine ecosystem so please include efforts to increase the predator species of sea urchins--sea otters and sunflower sea stars.
2025-07-30 07:11:57 -0800	dana1095@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. • Sea otters are a keystone species. • Reintroduction is a proven conservation strategy. • Reintroduction would help restore population connectivity between northern and southern sea otter subspecies. • Oregon's coastline is a critical gap in the sea otter's range. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thank you!
2025-07-30 07:13:31 -0800	julie.peyton@gmail.com	Dear People Who Can Make Things Happen: I'm quite pleased that your draft names sea otters as a Species of Greatest Conservation need, but then you really NEED to address the *reintroduction of sea otters* as a Conservation Action!! Reintroduction works, the Elakha Alliance has done the work of making it possible VERY soon, and you have every reason now to make this a top Conservation Action. So please, with the SWAP, make reintroduction of sea otters a priority in your Conservation Actions.

2025-07-30 07:14:05 -0800	honeykennedy@gmail.com	As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity. J. McCabe
2025-07-30 07:15:28 -0800	wendylawton29@gmail.com	I just moved from Oregon a month ago, after 11 wonderful years. I write to urge you to add sea otter protections to the SWAP. Science says that restoring these species is a nature-based solution to stop the loss of kelp forests that our ocean - and our fishermen - rely on. Native people want this. Scientists want this. Anyone who's job is tied to the health of the Oregon coasts want this. A simple investment of attention, money and time can add the single broken link to the chain of sea otter populations across the West Coast and protect the state for decades to come. Thank you for your public service and for considering my request. Wendy Lawton formerly of 780 West Pond Drive, Fairview, OR 97024

2025-07-30 07:16:34 -0800	nathanwbronson@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. In order to make the SWAP more actionable and more beneficial to all Oregonians, sea otter reintroduction should be included in the SWAP. Please revise the SWAP to include sea otter reintroduction.
2025-07-30 07:21:23 -0800	jonescr1@msn.com	As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy.
2025-07-30 07:25:47 -0800		Introducing otters to oregon coast seems essential to your plan
2025-07-30 07:30:54 -0800	llindageo@gmail.com	Hello ODFW, Thank you for your listing of the sea otter as Species of Greatest Conservation Need. But you need to do more than that. Please include a conservation plan that sets in motion the reintroduction of the sea otter to the Oregon coast The benefits are known. Sea otters will eat their way toward healthier kelp beds. Sea otters on the Oregon coast will help the genetic diversity of the otter populations to the north and south. Reintroduction is not a novel concept. Many sea otter populations globally are the result of reintroduction programs. Non-governmental organizations are standing by ready to help ODFW in this effort. Partner up and make this happen, the Oregon coast needs sea otters and ODFW has a role to play in that. Thank you for the opportunity to chime in.

2025-07-30 07:39:44 -0800	Jac.danos@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. As a keystone species the biological health of the larger environment greatly benefits from having otters present. Their presence keeps the nearshore kelp beds healthy. While their presence is of immense cultural importance to the Coastal First Nations. Reintroducing Sea Otters has been a proven successful conservation model in the past. Roughly 35% of today's global sea otter population are due to reintroduction of the species in Alaska, British Columbia, and Washington. Genetically connecting the populations between Washington and California would strengthen needed diversity for long term resilience of the species. Our coastal waters are changing drastically due to the warming of the oceans and climate change. Reintroducing sea otters along the Oregon coast would reduce the risks this valuable environment faces by helping returning an integral species for this environment to thrive. It will create a more stable geographic distribution of this keystone species strengthening the resilience of our productive coast. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Thank you,
2025-07-30 08:00:35 -0800	tomsueschraeder@msn.com	Keep up the great work!
2025-07-30 08:02:22 -0800	amyp@zzz.com	SWAP revision: Please protect the sea otter habitat and that may also protect the Sunflower Sea Stars. Our ocean is fragile as we saw with the purple sea urchins and sea stars. When things get out of balance it affects the whole eco system. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy.
2025-07-30 08:17:25 -0800	shepherdsond@gmail.com	I urge you to consider adding conservation actions for SEA OTTER recovery to the SWAP. Recovery can't happen without action.

2025-07-30 09:00:40 -0800	ekjeck@yahoo.com	Sea Otters and Sea Starts are vital to our ecosystem. Please include them in Oregon's State and Wildlife Plan. Sincerely, Ellyn Jeck
2025-07-30 09:19:19 -0800	sara.hamilton@oregonkelpalliance.com	My name is Sara Hamilton and I am the Science Coordinator for the Oregon Kelp Alliance (ORKA). I have reviewed the revised SWAP on behalf of ORKA and applaud the state for including kelp forests as a Specialized and Local Habitat. We are also pleased to see bull kelp, sunflower sea stars, and all three of Oregon's abalone species listed as Species of Greatest Conservation Need. We are concerned, however, as to how many of the conservation recommendations around kelp and kelp forest species focus only on monitoring and filling data gaps and neglect to list any action-oriented conservation actions. Monitoring and research, in and of themselves, do not advance conservation. It is only when that knowledge and information are combined with action that you can advance conservation. We see this lack of action-oriented conservation recommendations in the "Ecoregions-Nearshore" section, the "Specialized and Local Habitats – Kelp Forests" section, and the Species of Greatest Conservation Listing information for bull kelp, sunflower sea stars, red abalone, pinto abalone, and flat abalone. Further, the current recommended conservation actions for these species neglect to include projects that Oregon state agencies are currently supporting. For instance, ODFW is currently supporting active kelp restoration work through the Letters of Authorization is has given to ORKA and others to remove sea urchins from three kelp forest restoration sites. Additionally, ORKA is currently piloting bull kelp outplanting and spore enhancement techniques at two sites with permission from the Department of State Lands. Thus the current list of recommended conservation actions does not acknowledge ongoing work in the state supported by state agencies. For the "Ecoregions-Nearshore' section, the "Specialized and Local Habitats – Kelp Forests' section, and the Species of Greatest Conservation Listing information for bull kelp, we recommend adding the following conservation actions: - Pursue active restoration of lost kelp forest habitat at suitable locations using sea urchin population control, kelp outplanting, and kelp spore enhancement. - Explore options for promoting the restoration of sea urchin predator species in Oregon, including the sunflower sea star. - Pursue kelp forest preservation by working with commercial, recreational, and Tribal urchin harvesters to direct long term urchin harvest effort at sites with increased purple sea urchin densities. - Assess the potential for using bull kelp strains with improved heat tolerance for restoration work. - Assess how to preserve genetic diversity in Oregon's kelp species in the face of ongoing population declines.

For the three listed abalone species, we recommend adding the following conservation actions:

- Support kelp forest restoration and preservation action in areas of high importance to abalone populations to restore abalone food sources.

- Explore the potential for captive breeding and outplanting work in Oregon in coordination with ongoing efforts in California and Washington

For the sunflower sea star, we recommend adding:

- Explore the potential for captive breeding and outplanting work in Oregon in coordination with ongoing efforts in California and Washington.

The additional conservation actions we recommend here align closely with coastwide, national, and global plans for kelp forest species recovery, including The Nature Conservancy's "Roadmap to recovery for the sunflower sea star (Pycnopodia helianthoides) along the west coast of North America", the Kelp Forest Alliances' "A roadmap for protecting and restoring 4 million hectares of kelp forests by 2040", and abalone recovery and management plans for California and Washington (see References).

Overall, given that a stated goal of the SWAP is to "provide a wide range of voluntary conservation tools, to empower local communities and landowners to take advantages of existing opportunities to act", the current recommended conservation actions for these kelp forest species overlook important avenues through which communities could or already acting. Adding the conservation actions we have suggested above will help Oregonians understand the range of conservation actions available for preserving these species and ecosystems.

Our other recommendation for the revised SWAP is to add other key kelp species to the Species of Greatest Information Need list, including Macrocystis pyrifera, Laminaria setchellii, Pterygophora californica, and Pleurophycus gardneri. Bull kelp is but one kelp species making up the diverse assemblage of kelp species present in Oregon's kelp forests. L. setchellii, P. California, and P. gardneri are common subcanopy kelp species that play a unique role in the kelp forest (Hamilton et al 2024). Spatially, these kelps provide different kinds of habitat from canopy forming kelps due to their position in the water column. Temporally, as perennials their population dynamics contrast from that of Nereocystis luetkeana, which exhibits dramatic changes in population size from year to year. Additionally, M. pyrifera has a very limited range in Oregon and thus the species is at increased risk of local extinction. While the population status of these species is less understood than that of bull kelp, adding these species to the SGIN list will help Oregonians understand that many kelp species contribute to Oregon's vibrant nearshore communities.

We thank you for considering these recommendations and look forward to using the new State Wildlife Action Plan. Please reach out to me if you have further questions (sara.hamilton@oregonkelpalliance.com).

Sincerely,

Sara Hamilton, PhD
Science Coordinator
The Oregon Kelp Alliance

		References: Heady, W. N., and et al. 2022. Roadmap to recovery for the sunflower sea star (Pycnopodia helianthoides) along the west coast of North America. Page 45. The Nature Conservancy, Sacramento, California. Eger, A., and et al. (2022). A roadmap for protecting and restoring 4 million hectares of kelp forests by 2040. Kelp Forest Alliance, Sydney, Australia. Recovery Plan for Pinto Abalone (Haliotis Kamtschatkana) in Washington State. 2014.Puget Sound Restoration Fund. https://restorationfund.org/wp-content/uploads/2020/06/2014_Kamtschatkana_Recovery_Plan_clean_Sept2015.pdf Abalone Recovery and Management Plan. 2005. California Fish and Game Commission. https://wildlife.ca.gov/Conservation/Marine/ARMP Hamilton, S. L., T. Calvanese, S. A. Gravem, A. W. E. Galloway, D. Chabot, E. Vidusic, and N. Webster. 2024. 2024 Oregon Kelp Forest Status Report. The Oregon Kelp Alliance, Port Orford, OR.
2025-07-30 09:52:29 -0800	mymy0205@comcast.net	PLEASE help us keep the sea otter and star fish around for our children and grandchildren. They are a part of our Oregon coast and should be cared for as such. Thank you, Maya J. Nelson
2025-07-30 10:10:33 -0800	wrenlikeabird@gmail.com	As an Oregon retired public educator, I have always supported protecting our natural wildlife and the environment. Please protect the future of the ocean and sea otters by making informed, protective laws for the future! Our children and grandchildren deserve to beable to see them in their habitat- alive and thriving!
2025-07-30 10:10:42 -0800	penwillen@gmail.com	We keep letting things disappear. Please do not let this happen. We need to see these things in their natural habitats not just zoo's and aquariums.
2025-07-30 10:26:51 -0800	angrypixie@protonmail.com	To whom it may concern: It seems the staffer who wrote the draft plan of the revised SWAP has overlooked any mention of recommended Conservation Actions for sea otters. The omission is not in good faith. Please complete the draft and share with state residents? Thank you for doing what's right and transparent.
2025-07-30 10:43:41 -0800	cciecko51@gmail.com	Very disappointed that the SWAP fails to include strategies to bring sea otters back to Oregon's ocean areas. Sea otters are a keystone species so their presence means whole aquatic ecosystems benefit when populations are healthy. Although previous efforts at reintroduction have not produces the desired results, ODFW should continue efforts at re-establishing viable populations. Please amend the plan to make a serious, concerted effort. Thank you for considering my comment. Charles Ciecko

2025-07-30 11:22:57 - 0800	skelso9314@aol.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAT). In addition, listing specific conservation ACTIONS in the plan are critical; sea otter reintroductions are key to making the Plan successful. Sea otters are a keystone species. They carry a significant presence in maintaining the health of our coastal ecosystems - both biologic and and economic. Sea otters are voracious predators of sea urchins which in turn destroy kelp forests. This leads to overgrazing of kelp forests and thus, their destruction. Many serious, negative consequences result, both to the marine life present there and the stability and health of our coasts. Areas without kelp forests become marine deserts unable to support marine wildlife; property loss and infrastructure damage cost millions of dollars to taxpayers each year. Sea otters are critical to the coastal ecosystem health. Another outsize issue related to wildlife populations today, the sea otter included, is connectivity. The health of any species is greatly dependent upon a healthy gene pool with members of species able to travel between populations and realize successful reproduction opportunities. (This is paramount in securing future viability.) Re-establishing connectivity between the northern and southern populations is critical in sea otter recovery. In summary, we must not only protect sea otters, but carry out a reintroduction plan if we hope to truly help them recover. I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter revised State Wildlife Action Plan.
2025-07-30 11:47:13 - 0800	allisonmblizzard@gmail.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go FURTHER by identifying reintroduction as a PRIORITY Conservation Action in the revised species profile. "In Oregon, a 2024 study by the Oregon Kelp Alliance found that over a 12-year period, the kelp forest off the coast declined by up to 73%, primarily due to an out-of-control population of purple sea urchins, which graze on the kelp. This system is out of balance largely owing to the absence of a keystone species: xvlh-t'vsh, which means "sea otter" in the Athabaskan language of the Confederated Tribes of Siletz Indians. For more than 20 years, the Siletz Tribe has been working to reintroduce sea otters." (https://www.hcn.org/issues/57-6/sea-otters-to-get-another-chance-in-oregon-and-northern-california/) Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Thank you!
2025-07-30 11:48:19 - 0800	timjenkins@mac.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.

2025-07-30 11:51:08 -0800	oregonways@yahoo.com	Please continue to protect our ocean and its creatures! ourselves For both our health and the planet. We need more protection not less in these changing times
2025-07-30 12:05:31 -0800	cjblaney46@gmail.com	It is crucial to the health of our coastlines and seas that we protect sea mammals and manage fisheries. We want to save these stressed populations and promote their wellbeing. Stop actively destroying and over harvesting vulnerable populations and encourage a return to balance. The time to follow science is now. Thank you for doing the right thing and damn you if you don't. Sincerely CJ Blaney
2025-07-30 12:10:43 -0800	nevinsusan@gmail.com	I urge the ODFW to strengthen the SWAP with actionable steps to reintroduce otters to Oregon. They are necessary to our kelp forest ecosystem.
2025-07-30 12:14:17 -0800	greenzoem@gmail.com	As someone who earned a BS in environmental studies at the University Oregon, I've spent time learning not just about ecosystems, but about the deep connections between animals, people, and place. One of the most memorable parts of my education was exploring how human decisions—policy, economy, culture—shape the survival of species and the resilience of our shared environment. That's why I'm urging ODFW to go further than listing sea otters as a Species of Greatest Conservation Need in the updated SWAP. We need a clear, written commitment to sea otter reintroduction as a concrete conservation action. Sea otters are essential to maintaining healthy kelp forests, which support biodiversity, protect coastlines, and store carbon. Their absence from Oregon's coast is not just an ecological gap; it's a reflection of what's been lost, and what we still have the power to restore. Bringing sea otters back to Oregon would represent a real step forward in honoring our responsibilities to the natural world, and in making our policies reflect the science, values, and commitments we claim to hold. Please strengthen the plan by including clear, actionable steps for reintroduction. Thank you!
2025-07-30 12:14:37 -0800	darlene.chirman@gmail.com	It is time for a reintroduction program of sea otters in Oregon. They are an integral part of the marine ecosystem, which has been missing in Oregon for far too long. Sea urchins are major part of their diet, and urchin populations are unnaturally high without their major predator. Sea urchins eat the kelp forests, which are crucial for coastal protection and for carbon storage. Please initiate the sea otter reintroduction. Its been gratifying to see the sea otter recovery on the California Central Coast. As an ecologist, I look forward to their recovery in Oregon Darlene Chirman, Portland OR
2025-07-30 12:19:13 -0800	hap@alumni.stanford.edu	I strongly support adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. I thereby urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Thank you

2025-07-30 12:20:04 -0800	nlbailey25@gmail.com	Reintroducing sea otters to the Oregon coast offers a range of ecological, cultural, and potential economic benefits. 1. Restoring kelp forests: Sea otters are a keystone species, meaning their presence significantly impacts the entire ecosystem. They regulate sea urchin populations, which, if left unchecked, can overgraze and destroy kelp forests, creating unproductive "urchin barrens". 2. Enhancing biodiversity: Healthy kelp forests provide critical habitat and food sources for hundreds of species, from fish and invertebrates to seabirds and marine mammals. By controlling urchins, sea otters allow kelp forests to flourish, increasing the diversity and abundance of marine life in the nearshore environment. 3. Mitigating climate change: Kelp forests and other coastal wetlands, like seagrass meadows, are crucial "blue carbon" ecosystems that capture and store significant amounts of atmospheric carbon dioxide, thereby helping to combat climate change. Sea otters contribute to this by maintaining healthy kelp and seagrass beds. 4. Improving coastal resilience: Healthy kelp forests and seagrass meadows also buffer coastlines from the impacts of sea level rise and stronger storms, increasing coastal resilience. 5. Reconnection with Indigenous heritage: Sea otters hold deep cultural significance for Oregon's coastal Indigenous tribes, including the Chinook, Coos, Coquille, Siletz, and others. Their elimination during the fur trade disrupted this legacy, and reintroduction offers a chance to honor their place in tribal heritage and restore traditional connections to the environment. 6. Symbolic and spiritual value: In many Indigenous cultures, sea otters symbolize friendship, peace, kindness, family, and curiosity. They are revered in creation stories and traditional ceremonies, representing strength, resilience, and harmony with nature. 7. Ecotourism: Sea otters are charismatic animals that attract tourists and generate revenue for local communities through activities like wildlife viewing, kayaking, hiking, and fishing. 8. Support for fisheries: While sea otters prey on some shellfish species like crabs and clams, potentially impacting local fisheries in certain areas, research suggests that the overall benefits of their presence might outweigh the costs. Healthy kelp forests and seagrass beds, promoted by sea otters, serve as important nursery grounds and habitats for various fish species, potentially leading to increased finfish catches. 9. Increased ecosystem services: The enhanced health and productivity of kelp forests and seagrass beds in the presence of sea otters contribute to valuable ecosystem services like carbon sequestration, filtering contaminants, and protecting the shoreline.
2025-07-30 12:22:11 -0800	cyndi.n.curtis@gmail.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.

2025-07-30 12:25:30 -0800	nettleshipjanet@gmail.com	Comment: "I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction." Personalizing this message is highly encouraged!
2025-07-30 12:25:49 -0800	jmahler4433@gmail.com	Hello. I understand that the updated State Wildlife Action Plan is in need of additional clear and actionable steps to advance sea otter reintroduction.. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems. Their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Thank you! Sincerely, Joan Mahler (Portland, OR)
2025-07-30 12:28:58 -0800	taybennett16@outlook.com	Please consider adding an action plan for the restoration of sea otters. According to the Oregon kelp alliance, the Oregon coast has lost around 70% of its kelp coverage. Recovering our kelp forest is vital to maintaining our fisheries and that starts with sea otters. It's especially important to remember the 90% loss of sunflower sea stars in Oregon which are another important predator for sea urchins, the main culprit for our loss of kelp. The kelp forests are also important for maintaining and protecting our coastline, which many homes and businesses are built on.
2025-07-30 12:36:49 -0800	rcschmidt12@icloud.com	Advocate
2025-07-30 12:56:21 -0800	helluvahelluva222@proton.me	Sea otters are critical to healthy kelp forests habitats, and these habitats if allowed to grow large and free of human caused pollution , will improve the lives of humans by improving the health and population of all ocean species we and our economy depends upon. Also consideration for the simple beauty of a healthy kelp habitat brings joy to those who live and visit these abundant locations.
2025-07-30 13:06:36 -0800	lakeok8003@hotmail.com	I am writing to express strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. We humans wiped them out and it is our duty to reintroduce them and strengthen their habitat in Oregon coastal waters. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction."

2025-07-30 13:07:18 -0800	amycarlson@comcast.net	I strongly support adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. Listing sea otters as a Species of Greatest Conservation Need is an important start. But I believe that plans should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Thank yon for your serious consideration.
2025-07-30 13:10:19 -0800	9977440@gmx.net	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Sea Otters are a vital part of the nearshore ecosystem that has been missing for too long. The unbalanced Urchin barrens are a product of missing Sea Otters devastating to kelp . Kelp beds are essential for the early life of many fish and other marine life. Kelp beds also moderate wave action protecting the coast from erosion. Sea Otters need to be returned to the rocky shore. Ecosystem balance will never be achieved without them.
2025-07-30 13:14:48 -0800	igiancarlo@environmentoregon.org	July 30, 2025 Oregon Department of Fish & Wildlife (ODFW) State Wildlife Action Plan Revision Comment ODFW Staff and Commissioners, Environment Oregon is a statewide advocacy group that works for a greener, healthier Oregon. Having thriving wildlife is essential to achieving our vision and provides the basis for our comments on your updated State Wildlife Action Plan (SWAP). The world is facing a biodiversity crisis and Oregon is not immune. Roughly one third of Oregon's wildlife species are at risk of decline. Climate change, human disturbance, pollution and more threaten Oregon's key habitats, from our rocky coast to the high desert, and the wildlife that call these places home. The SWAP is successful in outlining many of these at-risk areas, imperiled wildlife and stressors to them. It also provides helpful resources such as the Conservation Toolbox that give Oregonians opportunities to get involved with conservation first-hand. However, despite these positives, many of the recommended actions to benefit Species of Greatest Conservation Need are not strong enough to recover key species. This is especially evident in the relationship between sea otters, kelp forests and eelgrass meadows.

		For the first time, sea otters are listed as a Species of Greatest Conservation Need which we strongly support. No stable population has existed in the state within the last century, aside from a failed reintroduction effort in the early 1970's. Without sea otters, Oregon's kelp forests have struggled due to an overabundance of purple sea urchins, which overgraze kelp. The SWAP lists bull kelp as a Species of Greatest Conservation Need and notes that a lack of predators that eat the kelp grazers has been a contributing factor in their disappearance. Within the past decade alone, Oregon has lost roughly two-thirds of our kelp forests and if strong action isn't taken, we risk losing these vital coastal ecosystems. Native eelgrass is also identified as a Species of Greatest Conservation Need, one that is susceptible to damage from European Green Crabs, an invasive species harmful to estuaries outlined within the SWAP. European Green Crabs damage the root systems of eelgrass and compete for resources with native species, creating an ecosystem imbalance. Evidence from California shows that estuaries impacted by European Green Crabs benefit from the presence of sea otters, making the case to reintroduce them in Oregon all the more compelling. However, the SWAP does not recommend any conservation action for sea otters or recommend reintroduction, which is a missed opportunity. Reintroduction would directly benefit bull kelp and native eelgrass, which are both listed as a Species of Greatest Conservation Need, and could establish a stable population of sea otters. For the sake of Oregon's coastal ecosystems, we urge you to consider reintroduction as a recommended action to conserve several Species of Greatest Conservation Need, bolster coastal ecosystems and support all the wildlife that rely on these areas. Sincerely, Ian Giancarlo, Oceans Advocate Environment Oregon
2025-07-30 13:19:38 -0800	isv1953@gmail.com	Oregon's sea otters were wiped out by the fur trade over a century ago — and despite efforts to bring them back, they still haven't returned to our coastline. This loss is not acceptable. Sea otters are listed as a "Species of Greatest Conservation Need" in Oregon Department of Fish and Wildlife's updated Oregon's State Wildlife Action Plan (SWAP) draft. However, that plan is missing a critical element: a concrete, written commitment to conservation actions that would reintroduce sea otters to Oregon. Bringing sea otters home should be a priority, not an afterthought.
2025-07-30 13:25:13 -0800	aj_wagner@fastmail.us	Originally from the Rocky Mtns, since living in this area for almost a decade, I have become interested in & an annual financial contributor to organizations backing the reintroduction of sea otters and sunflower seastars on the Oregon coast. It's part of an oxygen producing cycle that just makes sense for any specie that breaths oxygen... like you and I! You likely know the cycle - kelp produces oxygen, purple sea urchins decimate kelp beds, no one I know seems interested in learning to love eating purple sea urchins! They are thriving! But sea otters and sunflower seastars delight in them, and we get the kelp producing oxygen!! Waaahoo! Please incorporate/support actions promoting this cycle into the SWAP. Thank you, and thank you for the service you give us!! Anne Wagner (& John)

2025-07-30 13:35:52 -0800	rudy.berger@outlook.com	I strongly support bringing the sea otters back to our beautiful coast. They will help with eel grass as well as becoming a delightful sight to coastal residents and tourists. We all love watching them in zoo/acquariums, why not in a natural environment? Rudella Fuller-Berger
2025-07-30 13:37:03 -0800	ggsabba@gmail.com	Please commit to the reintroduction of sea otters to Oregon. Sea otter's control of sea urchin populations help kelp forests thrive. Kelp forests are vital to diverse species of fish, shorebirds and invertebrates. Also, kelp forests provide much needed carbon sequestration for our current situation. Gail Sabbadini Retired Biologist
2025-07-30 13:47:31 -0800	dkarina65@yahoo.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.
2025-07-30 13:51:45 -0800	yuiqwe1@gmail.com	As a fisherman and wildlife appreciator I ask that you include some actual action items for restoring sea otter in the new SWAP. It seems limits on rockfish have gotten more and more restrictive in recent years. This year they hit an all time low of four fish with only one canary rockfish and no quill back, yellow eye or China rockfish allowed in the bag limit. It is my understanding that sea otter predation on sea urchin would benefit our reef ecology by allowing more kelp growth and presence. More kelp means more feeding and hiding habitat for young fish including rockfish. Please include some specific actions for restoring sea otter to the Oregon coast in the new SWAP.
2025-07-30 14:52:40 -0800	mountaintricia@yahoo.com	Please protect marine mammals!
2025-07-30 15:02:15 -0800	william.w.chadwick@gmail.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.

2025-07-30 15:02:58 -0800	jbiedler1@gmail.com	Please include Sunflower Sea Stars, and Sea Otters, in Oregon's State Action Plan. I am an Oregonian, residing in Multnomah County, I want Oregon to commit to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: * Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. * Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. * Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy. Including these forward-looking and ecologically sound actions in the 2025 SWAP will ensure the plan lives up to its full potential as a proactive blueprint to conserve the coastal species and ecosystems that define Oregon's identity. Please include both sea otters and sunflower sea stars in the SWAP! Thank you for your time and attention to this matter. Sincerely, Jennifer
2025-07-30 15:21:23 -0800	adamshaleen@gmail.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.

2025-07-30 15:26:55 -0800	jane@elakhaalliance.org	Elakha Alliance www.elakhaalliance.org Comments on the DRAFT Oregon Statewide Wildlife Action Plan (SWAP) July 30, 2025 Sea otter reintroduction should be added as a Conservation Action under the sea otter SGCN profile. Reintroduction is a proven, science-based conservation tool and sea otter reintroductions have succeeded across the North Pacific, including in Alaska, British Columbia, Washington, and California. According to the USFWS, about 35% of the current global sea otter population exists today because of previously successful reintroduction efforts. These programs demonstrate that reintroduction is not experimental—it's a well-established, effective method for recovering sea otter populations. Including reintroduction as a Conservation Action in the SWAP does not obligate ODFW to take action or prioritize funds for a reintroduction process; it does, however, identify a conservation action that is appropriate for Oregon and is supported by the best available science. The Elakha Alliance also strongly recommends that the role of sea otters as a keystone species in kelp forests, where they are critical predators of purple sea urchins, and their role in restoring eelgrass in estuaries be listed in the sea otter SGCN profile and the Key Habitats section for eelgrass and kelp beds. Both habitats are suffering from a variety of threats described in the Draft SWAP. Kelp beds have declined, in part due to "abundance of organisms that consume kelp (e.g. sea urchins)," a direct result of the absence of sea otters and sunflower sea stars, both of which are voracious predators of sea urchins. Eelgrass beds in estuaries are under threat due, in part, to an expanding population of invasive European green crabs, which are consumed in large quantities by sea otters in estuaries in California. In addition to their impact on several Key Habitats, sea otters would also help to address several Key Conservation Issues, including mitigating the effects of climate change on the marine environment and controlling the spread of non-native invasive species in estuaries. Sea otters have been shown to protect and promote the growth of kelp beds and other macroalgae by predating on sea urchins and thus promote the capture and sequestration of carbon from the atmosphere. While the exact amounts can vary, estimates show that the contribution of kelp forests to carbon sequestration can be significant at regional scales. Likewise, sea otters are known to capture and consume large numbers of European green crab, thus reducing their adverse effects on eelgrass beds, estuarine health, and species that depend on them. Returning sea otters to Oregon's coastal environment can help achieve multiple environmental, habitat and wildlife benefits, something that the U.S. Fish and Wildlife Service concluded in its 2022 Feasibility Assessment. Reintroduction is necessary to return them to their former place as a keystone species within Oregon's marine and estuarine ecosystems. It is a proven, science-based conservation tool that will fill a critical habitat gap on the Oregon coast and safeguard the future of sea otters as a species by restoring lost genetic diversity and adaptive potential. For these reasons,the Elakha Alliance requests that the"reintroduction of sea otters" be added to the Conservation Actions in the 2025 Oregon Statewide Wildlife Action Plan that pertain to the species itself and to Kelp Beds, Eelgrass Beds, and Key Conservation Issues. Sources https://www.elakhaalliance.org/feasibility-study/

		https://www.fws.gov/media/feasibility-assessment-sea-otter-reintroduction-pacific-coast https://www.nps.gov/articles/000/biologists-restored-an-estuary-to-revive-eelgrass-then-an-otter-swam-118-miles-to-reach-it.htm https://www.science.org/doi/10.1126/science.abf2343 https://link.springer.com/article/10.1007/s10530-024-03467-3 https://journals.plos.org/climate/article?id=10.1371/journal.pclm.0000290 https://esajournals.onlinelibrary.wiley.com/doi/10.1890/110176
2025-07-30 15:35:33 -0800	J-Thorpe@comcast.net	Save the starfish. Save the sea otters.
2025-07-30 15:38:27 -0800	dosgtos438@msn.com	It is time that we protect Otters and bring them back to their historic habitats.
2025-07-30 15:39:29 -0800	springer.s97@gmail.com	I strongly support adding sea otter conservation to the plan for Oregon. Reintroduction is a proven plan in otter conservation. The health and presence of animal populations is a key component in the health of our beautiful state Oregon where I have lived and worked 45 years of my 66 years. Native species of animals are a big draw for tourism in our state. I visited Canon Beach and Manzanita four times in the last couple months to see the puffins on Haystack Rock. It was thrilling to see them- while birding at Haystack I visited with people who had traveled from Maryland for a week of vacation on the Oregon Coast. They were planning on traveling down the Oregon Coast. I encouraged them to stop at Depoe Bay to see the resident summer whales who they will be able to observe from the shoreline(not a whale watch boat) and hear their blows as they rise up from feeding in the kelp beds. It would be wonderful if in 20 years I could recommend to future visitors Oregon that she stop in Depoe Bay to observe the resident summer whales and recently reintroduced sea otters that are thriving! Sincerely, Sandra L Springer
2025-07-30 15:49:57 -0800	fredtep@gmail.com	I was pleased to see that sea otters are now recognized as a Species of Greatest Conservation Need, but was confused to not see them also listed among species for which the plan proposes conservation actions. As you already know, sea otters are essential to intertidal and marine ecosystem health. Please include in the plan at least initial steps to bring them back to the Oregon coast, thus connecting the dots of the BC, Washington, and California sea otter populations. thanks, Fred Tepfer, Eugene and Seaside, Oregon fredtep@gmail.com

2025-07-30 15:54:53 -0800	brennasahatjian@gmail.com	I ahve been a resident of the PAcific West Coast of the US my entire life and it is one of the most beautiful places in the world. we need to protect it and the miracualous animal communities and other life forms that depend on a clean environment. I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.
2025-07-30 15:57:16 -0800	mydiane115@gmail.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction."
2025-07-30 16:08:22 -0800	coastmans@gmail.com	I am fully in support of the reintroduction of sea otters to the Oregon coast. Reason: 1) Kelp Beds. Since the demise of the sea otter, sea stars have functioned as the only means of controlling the urchin population. The proliferation of urchins has led to a 70% reduction in kelp forest habitat since 2010. As an active and avid freediver in southern Oregon, I have personally witnessed what this means: Underwater Desert. Purple urchins still compromise the main body of underwater sea life in the subtidal zone. The kelp has returned a tiny little bit. You can see (I can see) the fish brooding in the kelp forest that does exist. This is critical habitat for fostering black rockfish and other species integral to the food web. This is absolutely BASIC. Do not hesitate on this opportunity. -Roger Rasmussen, 17 Hamlet St, Port Orford, Oregon 97465 (541) 671-5340 coastmans@gmail.com
2025-07-30 16:17:35 -0800	zoevivre@yahoo.com	I would like to see language that protects sea otters written into the SWAP revision. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea otter recovery.
2025-07-30 16:20:38 -0800	zoevivre@yahoo.com	Please include language in the SWAP revision that includes conservation acts that will be taken in order to help Oregon's keystone species - sea otters. Thank you!
2025-07-30 16:28:36 -0800	wobobr123@yahoo.com	ODW please reintroduce sea otters to the Oregon coast because sea otters are the keystone species of the marine coast! Oregon needs them!

2025-07-30 17:15:18 -0800	sgtone@gmail.com	I strongly support adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Sea Otters are needed for a healthy Oregon Coast, both biologically, culturally, & economically. Bring back Sea Otters! Susan Tone Nehalem, OR
2025-07-30 18:07:39 -0800	baconbitmadison@gmail.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.
2025-07-30 18:32:36 -0800	nanisalive@gmail.com	Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Besodes. they are incredibly charming creatures and add to human enjoyment.
2025-07-30 19:28:10 -0800	jmeredit@bendnet.com	I urge you to plan a reintroduction program for Sea otters in marine waters off Oregon. Please take action and not just establish a policy acknowledging the importance of Sea otters.
2025-07-30 19:49:35 -0800	masterfudge.jg@gmail.com	Please include sea otters and sunflower sea stars in Oregons conservation plan. They are keystone species and will help restore the ecosystem. Thank you.
2025-07-30 20:11:24 -0800	shermanwrite@msn.com	Sea otters rock! We need to bring them back to Oregon ASAP. Our kelp forests are suffering because sea urchins are feeding on the plants. Sea otters eat urchins, thus protecting kelp from destruction. Whole ecosystems benefit from this biodiversity.
2025-07-30 20:17:55 -0800	jwesleyped@gmail.com	As a former ODFW employee and conservation scientist I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction.
2025-07-30 20:35:39 -0800	bgellatly@msn.com	This is a MUST DO action. The ecosystem depends on this species, and the extirpation in a time when less was known may be able to be forgiven. But, we are now better informed! Please the action to bring this otter back so it can provide its natural and beneficial role in the food web, in the control of imbalanced flora in the mixed-saline flow of tidal waters.
2025-07-30 21:29:29 -0800	maemadsen@gmail.com	Add sea otters and sunflower sea stars to the wildlife action plan. Thank you

2025-07-30 21:46:50 -0800	jim@alderspring.net	The impressive Oregon Conservation Strategy spells out needs for many species, mostly terrestrial. You have heard much about the critical keystone beaver in restoring watersheds. Sea otters play a similarly critical role in near-shore marine ecosystems. I urge you to adopt conservation strategies developed in adjacent Pacific coast states and begin developing conservation actions suitable for Oregon's most suitable habitats for Sea otters. Thank you, Jim Fairchild
2025-07-30 21:57:27 -0800		As a resident committed to protecting our wildlife habitats, I urge you to include restoration of sea otters and sunflower sea stars in the revised 2025 Oregon State Wildlife Action Plan. Sea otters and sunflower sea stars are keystone species that control sea urchin populations, thereby protecting kelp forests and keeping our marine ecosystems healthy. As Oregon confronts a mounting biodiversity crisis, the updated SWAP provides a vital opportunity to restore ecological function and resilience to our nearshore environments. I strongly recommend that the final SWAP include the following actions: Re-establish sea otters in Oregon's nearshore and estuarine environments to support kelp and eelgrass restoration and strengthen climate resilience. Explore augmentation of sunflower sea star populations through scientifically informed recovery efforts to protect critical habitats. Acknowledge the loss of these predators as a limiting factor for key habitats such as kelp forests and eelgrass beds, and identify their return as an active conservation strategy.

2025-07-31 00:02:32 -0800	contact@nwaic.org	Public Comment on the 2025 Oregon State Wildlife Action Plan Submitted by: Northwest American Indian Coalition (NAIC) Date: July 29, 2025 To the Oregon Department of Fish and Wildlife, On behalf of the Northwest American Indian Coalition (NAIC), we are writing in strong support of listing sea otters as a Species of Greatest Conservation Need in the revised Oregon State Wildlife Action Plan (SWAP). However, we are deeply concerned that the draft plan currently lacks any recommended Conservation Actions for this keystone species, including the urgently needed reintroduction of sea otters to Oregon's coastline. Sea otters are a vital part of our coastal ecosystem. Their role in maintaining healthy kelp forests and eelgrass beds enhances biodiversity and helps stabilize marine food webs—making them a powerful ally in the fight against climate change. Beyond their ecological value, sea otters hold deep cultural significance for Indigenous peoples of the Oregon Coast. Their presence is part of our traditional lifeways. The absence of sea otters in Oregon is not just an ecological loss—it is a cultural wound. We strongly urge ODFW to revise the 2025 SWAP to include clear, actionable Conservation Actions for sea otters, including prioritizing reintroduction efforts in partnership with Tribes and coastal communities. Reintroduction is a proven strategy. Efforts in Alaska, British Columbia, and Washington have shown that sea otter recovery is both feasible and beneficial, not only to ecosystems but also to economies and communities. Oregon's coastline represents a critical missing link for population connectivity and genetic diversity between northern and southern subspecies. We support and stand with the Elakha Alliance and all those working to restore sea otters to their rightful place in Oregon's nearshore ecosystem. We urge ODFW to honor Indigenous voices, cultural heritage, and the best available science by including reintroduction as a priority Conservation Action in the final 2025 SWAP.
2025-07-31 03:04:26 -0800		i do not live in Oregon but love Sea Otters!! please reintroduce them to Oregon and help support them. thank you, Carol
2025-07-31 05:58:18 -0800	jsfereday1017@gmail.com	Reintroduction of sea otters to the Oregon Coast should be supported by ODFW. As key species for kelp forest health, I believe it is in all Oregonians' interests to bring otters back. Fisheries, tourism, as well as ecosystem services, will benefit. Sincerely, Jamie Fereday 1017 Elm Ave. Coos Bay, OR. 97420

2025-07-31 06:02:05 - 0800	drensop@gmail.com	I support you to in push for actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. Why wouldn't you support the listing of sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Why wouldn't you support Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge you to support our desire to ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction."
2025-07-31 06:54:24 - 0800	bsegner22@gmail.com	I am writing to request moving forward to prioritize the creation and implementation of an actionable plan to reintroduce sea otters to Oregon. We are on the right track as the importance of sea otters to the coastal ecosystem and biodiversity has been recognized but that is only lip-service if an actual plan to move forward remains unconfirmed and unfunded. Please give serious consideration to making sea otter reintroduction a reality. Thank you.
2025-07-31 07:29:16 - 0800	jaysealee@gmail.com	I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction."
2025-07-31 07:48:17 - 0800	carrreid@yahoo.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP).
2025-07-31 08:47:19 - 0800	lbegnoche1@gmail.com	I strongly support the reintroduction of the sea otter in Oregon. We need this animal to rebalance the effect of the over population of sea urchin in our kelp beds.
2025-07-31 09:14:22 - 0800	babymcbird@hotmail.com	I am commenting as a current Oregon resident residing in Newport and wanting to see all of the abundant natural beauty and resources that this state offers continue indefinitely. I like that there's a focused list of 321 Species of Greatest Conservation Need. I was happy to see sea otters, tope sharks, Olympia oysters, sunflower stars, California condors, and many Old-Growth dependent species included. Though the American beaver was not listed as an SGCN, I am happy that these ecosystem engineers were spotlighted in the plan and that ODFW intends to include beavers in conservation work. I'm echoing the Elakha Alliance on sea otter reintroduction here: " I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan should be amended to also recommend Conservation Actions, including sea otter reintroduction, to further this designation. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea

otter recovery. Reintroduction would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. Oregon historically served as a mixing zone for these two subspecies, and restoring this connectivity would benefit the entire species. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile."

Sea otters are protectors of both kelp forest and eel grass habitats, helping to balance ecosystems that are highly productive. Bull Kelp and native eelgrass are also 2 of our SGCN and the habitats that they create support species important to a variety of commercial fisheries, including flatfish, crabs, and rockfish. In addition, they are integral to coastal food webs: Pacific Herring use eel-grass as a spawning substrate and are one of the most important food sources for marine predators, while kelp forests are home to plankton such as mysid shrimp, sustaining Oregon's 200 resident gray whales.
One concern regarding sea otter reintroduction in Oregon is the cost to fisheries, especially our largest fishery, Dungeness Crab. Since sea otters do eat a lot of hard-shelled prey, there needs to be a contingency plan in place for crab fisheries. ODFW needs to work with fisheries to agree upon how any significant negative impacts will be handled if they occur. Maybe things like a permit for expanded fishing in a currently robust boom-and-bust fishery with limited access or operations are provided equipment and expedited permitting for a different fishery. There also needs to be a determination made for how many sea otters the Oregon coast can sustainably support and what actions we will take if, decades after release, we encounter an overabundance issue. Sea otters, like pinnipeds, are protected under the Marine Mammal Protection Act. This protection has been vitally important to the recovery of marine mammal populations. However, in Oregon, many believe we have an overabundance of California sea lions: hurting a variety of fish, including ESA-listed salmon populations and the very important fisheries that they support. ODFW, NOAA, tribes, and others should work together to address this issue and take whatever management steps are necessary to support a balanced ecosystem.

I support House Bill 3568: Seafood to Schools

In January, I attended the 12th Annual Land-Sea Symposium in Yachats. Our District 10 State Representative David Gomberg spoke and one of the things he said was shocking: that in Oregon, 90% of the seafood that we harvest, we send out of Oregon, while 90% of the seafood that we consume in Oregon comes from outside of our state. Sometimes, we export our seafood to Asia, where it gets processed, and then we basically buy it back at a higher cost and in some lesser form. None of this makes any sense. So he has co-sponsored House Bill 3568 which would provide a total of $800,000 to lay some of the necessary groundwork for getting Oregon-harvested seafood into Oregon schools and onto students' plates. Likewise, we should be buying Oregon-raised and Oregon-processed beef for our schools. Good protein will support good learning and proper growth and development for our youth.

Things I hope to see:
State forests working to maximize connectivity between patches for Old Growth forest-dependent species.
Tribes co-partnering with ODFW to strengthen and manage our salmon fisheries and processing facilities.
State-wide composting of all organic materials.
Supporting farms and ranches with free-of-charge cattle-methane reduction strategies and free compost to replace synthetic fertilizers.

2025-07-31 09:43:17 -0800	ninjahq@gmail.com	Please include sea otter and sunflower sea star conservation in Oregon's State Wildlife Action Plan.
2025-07-31 10:21:39 -0800	FOX.OREGON@GMAIL.COM	Please consider adding Sea Otters to your final action plan. This keystone species are a vital part of our ecosystem and will help restore kelp forests and give the balance that is badly needed. It's time to reintroduce them to Oregon.
2025-07-31 11:29:50 -0800	kimba2007@comcast.net	Hello, In this day and age of collapsing ecosystems and disappearing species the current SWAP needs to include a reintroduction of the northern sea otter in the conservation action plan. I have observed otters while kayaking in Monterey Bay and in the northern reaches of British Columbia coastlines. It is now or never. Humans have manipulated the earth so much that species now rely on our intervention to exist. Seems there is no way around that. Especially as a keystone predator species. I hope you take action on including the sea otter in your planning efforts Sincerely, Kimberly O'Connor Bandon, Oregon
2025-07-31 11:58:54 -0800	khdaniels51@gmail.com	I urge you to list sea otters as a Species of Greatest Conservation Need in the Revised State Wildlife Action Plan and to recommend Conservation Actions, including the reintroduction of sea otters. A plan without implementation would jeopardize significant recent efforts to bring the sea otter back to the Oregon coast. Thank you. Katherine Daniels
2025-07-31 12:55:49 -0800	jessieeagan@gmail.com	Hello - I am writing in support of the inclusion of sea otters on the states Species of Greatest Conservation Need in the State Wildlife Action Plan (SWAP). However, the draft plan *must* be amended to also recommend conservation actions including sea otter reintroduction to Oregon. Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea otter recovery. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, strengthen species genetic diversity, and promote species-wide persistence. Given the best available science and the success of previous efforts, I strongly urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile.

2025-07-31 14:15:16 -0800	jabirusue@comcast.net	Sea otters are listed as a Species of Greatest Conservation Need, but the current draft of the revised SWAP doesn't include specific conservation actions for them, including reintroduction initiatives. Sea otters were once common sights along the coast in Oregon,. They were hunted to extinction without considering the consequences for the whole ecosystem. Sea otters are a keystone species, meaning they have a significant impact on their environment. Their absence has allowed sea urchin populations to boom, leading to the destruction of kelp forests, which are crucial habitats for many other marine species. Documented science studies suggest that the results of climate change also threaten the kelp forests which provide food and shelter for many marine species. Kelp has declined rapidly since the demise of sea otters. On top of that, sunflower stars, which prey on sea urchins, have also succumbed to changing conditions. The resulting accelerated loss of kelp has led to dead kelp zones. I strongly suggest that ODFW revise the SWAP draft and their management plan to return balance to the marine habitat. Instead of planning only for the sea urchin fishery, return a more sustainable habitat that existed for eons by returning the lost sea otters to the Oregon coast. All species, including hunans profit.
2025-07-31 14:36:06 -0800	deirdre.young541@gmail.com	I am submitting comments regarding the reintroduction of sea otters to the Oregon coast. I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Sea otters are considered a keystone species supporting a healthy kelp forest. They dine on sea urchins which have been known to devastate kelp forests when they have no predation checks on their population. Our coast has oxygen "dead zones" which could be aided by bringing back the otter. For climate mitigation/alleviation kelp can contribute by sequestering carbon. Please work to implement the actual reintroduction of sea otters! The children of our state will love you for it!

2025-07-31 14:41:03 -0800	NadiaEGardner@gmail.com	As a north Oregon Coast resident, I know how out of balance Oregon's nearshore ocean is and how it is only getting worse as climate change and pollution impacts grow each year. ODFW has the opportunity to help maintain our ocean's health by supporting the return of an iconic species to our coastal ecosystem, sea otters. Urchins populations have exploded and with the loss of so many sea stars from Sea Star Wasting Disease and no sea otters, we facing the loss of our productive kelp forests. Many of our fishing communities rely on fish reared in these areas. Otters could help. I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan. I ask that you add a corresponding Conservation Action, sea otter reintroduction. By reintroducing them, we will join and support Washington and California's efforts. Together, the west coast has the opportunity to support coastal resilience to benefit both wildlife and people before it is too late. Thank you.
2025-07-31 14:57:02 -0800	givemeallyourseaurchins@gmail.com	I urge those involved to add sea otters to the Oregon State Wildlife Action Plan. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Thank you!
2025-07-31 15:00:55 -0800	elianne97202@yahoo.com	I have a B.A. in Biology and am an environmental educator. I am pleased that sea otters are on the list of "Species of Greatest Conservation Need." However, unless there are actionable steps in Oregon Department of Fish And Wildlife's updated Oregon's State Wildlife Action Plan, it is just talk. Reintroducing sea otter should be included as a priority action. This would help restore a connection between northern and southern sea otter subspecies, which will strengthen genetic diversity and long term resilience. It will also reduce risks to the species from disease and oil spills. Alaska, Washington and British Columbia all have had successful reintroduction programs. Sea otters play a critical role in maintaining the health of kelp forests and eelgrass in estuaries, which in turn helps sequestration of carbon. Again, I urge you to include reintroduction of sea otters as a priority action in the updated State Wildlife Plan.
2025-07-31 15:01:33 -0800	courtneylynn04@gmail.com	Hello, I would like ODFW to reintroduce sea otters to Oregon. They are an important part of our local ecosystem, and we need them to help our kelp forests stay healthy. Please bring sea otters back to the Oregon Coast!
2025-07-31 15:14:04 -0800		Otters should be included in the wildlife protection act!

2025-07-31 16:02:53 -0800	likebutterbaby5@yahoo.com	Please support the reintroduction of sea otters to Oregon waters. We need them to help control sea urchins and help maintain and improve kelp forests along our coast. Thanks, Matt, Eugene, OR
2025-07-31 16:17:52 -0800	dgwilson802@gmail.com	Please include sea otters in SWAP. They are a critical part of the near shore kelp ecosystem that is important to many species of fish.
2025-07-31 16:40:25 -0800	willow@coastrange.org	I am a coastal resident, and understand the strong need for marine, estuary, wetland, and forest health and resilience. While our remaining forests are getting cut still, our oceans are becoming less healthy, our soils drying out with less nutrients and our waters poisoned, it is clear that our carbon storage is at high risk. Because of the current federal attack on our public forests, a large hope for health and carbon storage lies in our ocean's kelp forests! However, those too, are in such peril that many of us feel returning sea otters would be a critical step to recovering this vital carbon storage source. t I'm writing in strong support of adding clear, actionable steps to advance sea otter reintroduction in Oregon's updated State Wildlife Action Plan. While listing sea otters as a Species of Greatest Conservation Need is an important start, the plan should go further by identifying reintroduction as a priority Conservation Action in the revised species profile. Sea otters are vital to the health of Oregon's kelp forest ecosystems, and their return would be a major win for biodiversity, coastal resilience, and our marine environment. I urge ODFW to strengthen the SWAP by including clear, actionable steps for sea otter reintroduction. Thank you for your time, energy and diligence to the SWAP process, I watched one of your webinars and see how much work you all are putting into it.
2025-07-31 16:57:46 -0800	jane.rombouts@dsl.oregon.gov	Would it be appropriate to include a bit about Populus tremuloides / Carex obnupta Swamp Forest in 'Aspen Woodlands' habitat description? https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.683642/Populus_tremuloides_-_Carex_obnupta_Swamp_Forest Although the NatureServe states only 1 record, DSL has located another. It's likely there are others, if they were areas that people started to notice.
2025-07-31 18:00:21 -0800	jane.rombouts@dsl.oregon.gov	Probably too late for this SWAP update, but would ODFW be interested in working with DSL to have more alignment with descriptions of wetlands? Specifically our Aquatic Resources of Special Concern (ARSC) with descriptions in your Wetlands Habitat descriptions and in the Specialized and Local Habitat descriptions. ARSCs are described in our Removal Fill Guide, Appendix F https://www.oregon.gov/dsl/wetlands-waters/Documents/Removal_Fill_Guide.pdf Additional permitting requirements are required for impacts to ARSCs.

2025-07-31 19:55:40 -0800	lauren32007@gmail.com	I strongly support listing sea otters as a Species of Greatest Conservation Need in the revised State Wildlife Action Plan (SWAP). The draft plan does not, however, include any recommended Conservation Actions, including sea otter reintroduction to Oregon, to support this designation. Sea otters are a keystone species. Their presence promotes and protects the biological health and productivity of nearshore kelp beds and eelgrass in estuaries. In so doing, they promote carbon sequestration and help fight causes of climate change. Sea otters are also of profound importance to the culture of Oregon's coastal Indian tribes. Reintroduction is a proven conservation strategy. Roughly 35% of today's global sea otter populations come from reintroduction efforts in places like Alaska, British Columbia, and Washington. These efforts are a well-established tool in sea otter recovery. Reintroduction would help restore population connectivity between northern and southern sea otter subspecies, strengthening genetic diversity and long-term resilience. Oregon historically served as a mixing zone for these two subspecies, and restoring this connectivity would benefit the entire species. Oregon's coastline is a critical gap in the sea otter's range. Reestablishing a sea otter population in Oregon would reduce risks to the species from oil spills and disease, create a more stable geographic distribution, and strengthen species-wide persistence. Given the best available science and the success of previous efforts, I urge ODFW to include reintroduction as a priority Conservation Action in the updated sea otter species profile. Please appreciate your unique opportunity to make a difference for this species, the state of Oregon, the coastal areas in particular, and ocean ecosystems in general. I am not an Oregon resident, but this matter is of great importance to me. Sea otters are a treasure for all of us. Many of us live too far from the otters' natural habitats to be able to view them in the wild. Oregon has the ability, and perhaps even a responsibility, to ensure that these creatures are able to return to their historic range for the benefit of all of us. How wonderful it would be to visit Oregon and see them! I hope you will decide to include a thoughtful reintroduction of the sea otter. There are many allies in your area and around the country to help make this a success. Thank you very much for your consideration! Sincerely, Lauren Fausek
2025-07-31 21:28:46 -0800	dannyedwards86@gmail.com	Restoring otters to organ is extremely important. Please. include Conservation Actions in the 2025 to support reintroducing sea otters to Oregon.