

Exhibit D

**Supplemental Public Correspondence
Received as of August 15, 2025**

BORISCH Roxann B * ODFW

From: ODFW Commission * ODFW
Sent: Friday, August 15, 2025 3:52 PM
To: BORISCH Roxann B * ODFW
Subject: FW: SWAP - Elakha Alliance letter to OFWC
Attachments: Elakha Alliance_OFWC SWAP letter_08.14.25.pdf

From: Jane Bacchieri <jane@elakhaalliance.org>
Sent: Thursday, August 14, 2025 2:16 PM
To: ODFW Commission * ODFW <ODFW.Commission@odfw.oregon.gov>
Cc: COLBERT Debbie L * ODFW <Debbie.L.COLBERT@odfw.oregon.gov>; HUNTINGTON Geoff * GOV <Geoff.HUNTINGTON@oregon.gov>; FERRARI Chandra Alene * GOV <Chandra.Alene.Ferrari@oregon.gov>
Subject: SWAP - Elakha Alliance letter to OFWC

You don't often get email from jane@elakhaalliance.org. [Learn why this is important](#)

Dear Chair Wahl and members of the Oregon Fish and Wildlife Commission:

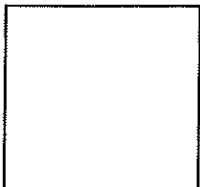
The Elakha Alliance appreciates having the opportunity to participate in and provide comments on the State Wildlife Action Plan revision process. In addition to the comments we provided to the ODFW staff, we submit the attached letter for your consideration.

Thank you,

Jane Bacchieri

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Jane Bacchieri (she/her)
Executive Director
Elakha Alliance
www.elakhaalliance.org
Email: jane@elakhaalliance.org
Cell: 503.753.9022



August 14, 2025

Mary Wahl, Chair
Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, Oregon 97302



Dear Chair Wahl and Commission Members,

Sea otters once were present on the Oregon coast, a segment of their wider range along the rim of the Pacific Ocean from Japan to Mexico. Their presence promoted the ecological richness of the marine environment that supported the lives and culture of Indigenous peoples and, more recently, has supported Oregon's coastal economy. But by the early 1900s, sea otters disappeared from the Oregon coast, hunted nearly to extinction throughout their range for their lush fur. Over time, the growth of remnant populations of sea otters and reintroductions to former habitats in the 1960s and 1970s enabled the species to recover in parts of their former range. But they remain absent from the Oregon and northern California coasts.

Throughout the twentieth century, as Oregon's coastal communities and economy grew, the marine environment seemed healthy and productive. The absence of sea otters was mostly unnoticed and unappreciated. But this unseen absence of sea otters, now recognized as a keystone species, created vulnerabilities in the complex marine ecosystem that are being exacerbated by Earth's changing climate. Oregon's kelp forests – the ecologic engine of the nearshore ocean – are greatly diminished under predation by sea urchins that were once kept in check by sea otters. Additionally, eelgrass beds in estuaries – nurseries for many fish and shellfish species – are threatened by non-native crabs which sea otters are known to consume. These are just a few examples of how Oregon's coastal environments are at risk and would benefit from reestablishing sea otters to their historic range.

The Elakha Alliance seeks to return sea otters to Oregon to restore and protect our coastal ecosystems and to create resilience needed in the face of climate change. Over the past year, we participated in the revision of the State Wildlife Action Plan (SWAP), contributing important, relevant scientific information. We did so on behalf of the public and future generations who, in a very real sense, are owners and inheritors of the marine and estuarine environment and who have demonstrated a strong interest in returning sea otters to their former habitats. We view the State Wildlife Action Plan as an important guide to help government agencies, organizations, landowners, and citizens to address wildlife needs for the next decade.

We are pleased that the draft SWAP lists sea otters (*Enhydra lutris*), bull kelp (*Nereocystis leutkeana*) and Native eelgrass (*Zostera marina*) as Species of Greatest Conservation Need (along with three species of abalone, red sea urchin, the Sunflower (sea) star, six species of birds, and several species of fish all of which depend on healthy, abundant kelp habitat).

Likewise, we are pleased that kelp beds and eelgrass beds are listed as Key Habitats. In the fluid marine environment these habitats are crucial for many species far beyond the physical

habitat itself. We agree with the description of threats to eelgrass from the non-native, invasive European Green crab (*Carcinus maenus*) and the mention of the decline in kelp beds with the suggestion that overgrazing by purple sea urchins and other predators may be partly responsible. These are good steps.

More important, however, the draft SWAP identifies climate change as a Key Conservation Issue. We agree with the characterization that "*Climate change acts as a "threat multiplier" by magnifying the effects of existing stressors on species and ecosystems*" and with the conclusion that "*No single strategy will ensure that ecological communities can adapt and survive. However, reducing the impact of compounding stressors is often one of the most effective strategies to increase the resilience of species and ecosystems.*"

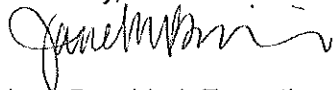
The next State Wildlife Action Plan is an opportunity to create a blueprint for species conservation in Oregon for the next decade in a way that is both informed by and responsive to risks and impacts from climate change. The scientific literature suggests that returning sea otters, a "strongly interacting species" can, over time, reduce many of the stressors (e.g., hypoxia, ocean acidification, invasive species) caused by climate change and thereby increase the complexity and resilience within marine and estuarine ecosystems on the Oregon coast. For these reasons, we request that the Oregon Fish and Wildlife Commission consider including Conservation Actions in the SWAP which will support the reintroduction of sea otters to Oregon, and in response to the identification of sea otters as a Species of Greatest Conservation Need and kelp bed and eelgrass beds as Key Habitats.

There are many questions to be answered and decisions to be made about returning sea otters to Oregon. We look forward to working with ODFW to do so. Your actions to support their return in the 2026 State Wildlife Action Plan will be an important first step.

We have provided additional detailed comments and information directly to ODFW staff.

Thank you for your efforts on behalf of Oregon wildlife conservation.

Sincerely,



Jane Bacchieri, Executive Director

PO Box 704

Siletz, Oregon 97380

jane@elakhaalliance.org

www.elakhaalliance.org

Cc: Deb Colbert, Director, Oregon Department of Fish and Wildlife
Geoff Huntington, Office of the Governor
Chandra Ferrari, Office of the Governor