

Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

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RMPs for Western Oregon
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RE: Comments on the Draft EIS for the BLM Western Oregon Resource Management Plan

To Whom It May Concern:

On behalf of the Pacific Seabird Group (PSG), I am writing to express strong concern about the Draft Western Oregon Resource Management Plan with respect to the Marbled Murrelet (*Brachyramphus marmoratus*), which is listed as threatened under the federal Endangered Species Act (ESA). This proposed new management plan would circumvent management direction established under the 1994 Northwest Forest Plan (NWFP) Record of Decision, specifically eliminating designated late-successional reserves (LSRs) and allowing increased logging and fragmentation of older-aged forests (mature, old-growth, late successional). The proposed plan would also contravene recovery strategies developed by the US Fish and Wildlife Service for the Marbled Murrelet (USFWS 1992). The USFWS (1996, 1997, 2006) clearly states that the NWFP--especially the LSRs--is the backbone of the murrelet recovery plan.

Our concern is that the LSRs and all remaining older-aged forests are critical for the survival and recovery of the Marbled Murrelet. We oppose the preferred alternative and the other alternatives in the draft plan and suggest that the Bureau of Land Management (BLM) should maintain all of the existing LSRs, older-aged forests, riparian reserves, and other habitat features that are critical to the survival and recovery of this threatened species. In addition, minimizing fragmentation near or adjacent to suitable and occupied habitat is essential the continued existence of murrelets in Oregon.

PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire

Pacific basin, including Canada, Mexico, Russia, Japan, China, Korea, Australia, New Zealand, and the USA. Among PSG's members are biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. For two decades, PSG has taken an active lead in resolving many scientific aspects of the biology and conservation of Marbled Murrelets. The PSG has served as an unbiased forum for government, university, and private sector biologists to discuss and resolve such issues.

The Marbled Murrelet was listed under the federal Endangered Species Act in 1992 primarily because of significant losses of nesting habitat through logging and development in coastal forests of Washington, Oregon, and California (USFWS 1992). An objective of the Marbled Murrelet Recovery Plan (USFWS 1997) is to stabilize the population at or near current levels by maintaining and/or increasing productivity and removing and/or minimizing threats to survivorship. According to the USFWS, long-term recovery of this species requires: protecting terrestrial habitat, including maintaining essential nesting habitat on Federal lands (LSRs and occupied sites), minimizing the loss of suitable but unoccupied habitat, creating and maintaining large blocks of contiguous forest cover, and maintaining and enhancing buffer habitat (USFWS 1997; 131-146). Without the LSRs, the demise of the murrelet population in Oregon will likely be accelerated (USFWS 1996: 26262):

Within the range of the marbled murrelet, the Northwest Forest Plan designates a system of Late-Successional Reserves, which provides large areas expected to eventually develop into contiguous, unfragmented forest.... The Service recognizes the value of the Northwest Forest Plan and acknowledges its integral role in marbled murrelet conservation. The Northwest Forest Plan complements this critical habitat designation by stressing the need for protection of large, unfragmented areas of suitable nesting habitat that are well distributed throughout the species' range, with special emphasis on areas close to the marine environment.

Marbled Murrelet Habitat Continues to Decline

Despite the listing of the Marbled Murrelet as threatened in 1992 and implementation of the NWFP in 1993, the amount of suitable murrelet habitat has continued to decline throughout this species' range. The loss and degradation of habitat has resulted from: (1) harvesting on private and state lands; (2) federal/private land exchanges; (3) thinning in suitable and occupied habitat, and buffers to suitable habitat; (4) lack of or inadequate Habitat Conservation Plans (HCP); (5) fragmentation effects from adjacent harvests and thinning; and (6) a variety of natural and anthropogenic disturbances, including fire and wind-throw. The total loss of suitable nesting habitat between 1993 and 2013 was estimated to be about 12 percent, or 307,957 acres of the estimated 2.2 million acres of suitable habitat available (Raphael et al. 2011; Falxa and Raphael in press). Nearly all of this 12 percent was lost on nonfederal land. Thousands more acres of suitable habitat on both federal and nonfederal lands, which were not surveyed, likely contained murrelets. Under the NWFP, HCPs and other habitat management plans, new murrelet habitat will not be suitable for 50-200 years. The inability to create new murrelet habitat in the short term combined with the continued harvesting of occupied and suitable habitat ensures a downward trend in suitable murrelet habitat into the future and limited options to recover the species.

The amount of mature and old-growth habitat suitable for murrelet nesting in coastal areas is significantly below historic minimums. For example, using a model based on historic fire size and historic fire frequency, Wimberly et al. (2000) estimated the mean percentage of old growth and late successional forest in the Oregon Coast Range during the last 3000 years. At the province scale, the mean percentage of old growth and late successional forest in the Oregon Coast Range was estimated at 39-55 percent and 66-76 percent, respectively. Currently, the entire Coast Range province contains only approximately 5 percent old growth and 11 percent late successional forests.

At the time it was adopted, the NWFP was considered to be an unprecedented decision to sustainably manage the remaining older-aged forests and take an ecosystem-based approach to forestry. These forests today are essential or critical for nesting Marbled Murrelets and other forest-dependent species. Given the time needed to create this unique forest type, substitutes are-- for all practical purposes--impossible to find. The Draft EIS proposes to circumvent the NWFP and allow what would amount to an unsustainable increase in harvest levels of older-aged forests throughout western Oregon. In PSG's opinion, the preferred alternative and other alternatives in the Draft EIS are flatly incompatible with the recovery of the Marbled Murrelet in Oregon.

Marbled Murrelet Populations Continue to Decline

The Washington, Oregon, and California murrelet population is estimated to be about 16,600 to 22,800 birds (data though 2013; Miller et al. 2012, Falxa and Raphael, *in press*). Population modeling indicates that this population is declining and will be extinct in Oregon and California within 100 years without changes in the amount and quality of nesting habitat, and in demographic trends (McShane et al. 2004, Miller et al. 2012). Low reproduction rates across Washington, Oregon, and California, as measured by nest success, indicate a population that cannot currently maintain itself (McShane et al. 2004, Beissinger and Peery 2003). Low nest success is caused primarily by nest predation, a function of increased forest fragmentation and proximity to human developments or recreation opportunities (Raphael et al. 2002, Peery et al. 2006). Thus, in order to diminish the threat of nest predation and increase murrelet reproduction, the ecosystem must be conserved to provide large, contiguous blocks of suitable nesting habitat and communities need to be involved in stewardship of these resources for all forest-dependent species.

In Summary

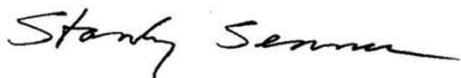
- (1) The Marbled Murrelet was listed in 1992 and populations continue to decline due to low reproduction success and high predation rates;
- (2) Despite the current system of forest reserves (LSRs) and critical habitat units on federal lands, occupied and suitable murrelet habitat is declining primarily due to harvest on private and state lands;
- (3) Murrelet habitat declines will accelerate in the future with the proposed changes to the LSRs and the NWFP;
- (4) Land uses that are contrary to murrelet recovery objectives (see also USFWS 2006) must be avoided within and adjacent to suitable habitats, especially ones significant to the stability and recovery of regional populations of this imperiled species; and
- (5) Continued habitat loss and the continued fragmentation of murrelet habitat will increase the risk of extinction of this unique seabird.

We agree with a published Evaluation Report on the 5-Year Status Review for the murrelet (McShane et al. 2004: 6-34), which states:

It is unrealistic to expect that the species will recover before there is significant improvement in the amount and distribution of suitable nesting habitat.

In conclusion, the PSG's opinion is that the proposal from BLM to eliminate some of the LSRs and permit harvesting in older-aged forests is not appropriate given the direction provided by the NFWP, the USFWS Recovery Plan for the Marbled Murrelet, threats to this species on non-federal lands, and the current status and environmental threats posed to the population throughout its range. To provide for the survival and recovery of the Marbled Murrelet, it is critical that BLM reconsider and design an alternative that prevents any further loss of murrelet suitable habitat and creates additional suitable habitat in the shortest time frame possible.

Sincerely,



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