

8 March 2014

Recovery Planning
Environment Canada
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Re: Comments on the Proposed Recovery Strategy for the Marbled Murrelet (*Brachyramphus marmoratus*) in Canada

Dear Sir/Madam:

Thank you for the invitation to the Pacific Seabird Group (PSG) and its Marbled Murrelet Technical Committee to comment on the Proposed Recovery Strategy for the Marbled Murrelet (*Brachyramphus marmoratus*) in British Columbia. We have grave concerns about the Recovery Strategy because, as proposed, it could allow decreases in Marbled Murrelet habitats and populations of up to 30 percent over 30 years. This Recovery Strategy makes no sense for a threatened and declining species under Canada's *Species at Risk Act* [SARA], and it should be revised to provide for the survival and recovery of the Marbled Murrelet in Canada.

The 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 14 nations, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, Peru, and the USA. The PSG's members include biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and representatives of nongovernmental organizations and individuals who are interested in marine conservation. For more than two decades, PSG members have undertaken and published on world-class research to identify gaps in understanding, resolve important scientific aspects of the biology and conservation of Marbled Murrelets, and contribute to or lead the development of federal recovery plans for listed seabird species. The PSG's annual scientific meetings have served as objective, open forums through

which government, university, and private-sector biologists contribute to and advance the development of best management practices for conserving and recovering this species in the United States and throughout its range.

The draft Recovery Strategy includes broad strategies for recovery and designation of critical habitat which appear beneficial for the Marbled Murrelet (hereafter, murrelet). However, the strategy also proposes to allow decreases in the amount of murrelet habitats and in the murrelet population of up to 30 percent of the 2002 population by 2032. This proportion was apparently chosen to ensure that the population does not decline by more than 30 percent over 30 years, which was a key criterion specified by Committee on the Status of Endangered Wildlife in Canada (COSEWIC) when the species was listed in 2002. However, given the murrelet's threatened status and the fact that loss of nesting habitat was the primary reason for the threatened designation by COSWEIC in the first place, habitat protections should now be expanded across the range of the murrelet in Canada.

Given scientific evidence for declining murrelet populations and habitat in British Columbia (Burger 2002, Piatt et al. 2006), we encourage Environment Canada to: (1) maintain or increase the current amount of suitable murrelet habitat; (2) maintain or increase current murrelet populations; and (3) provide adequate money for research and monitoring to ensure that the species and its habitat are being maintained. In addition, because the amount of habitat on eastern Vancouver Island is already more than 30 percent below 2002 levels, extra attention should be paid to increasing the amount of habitat there to levels that will ensure recovery.

The criteria used in this strategy and by the IUCN to assess extirpation risk are not the best way to assess recovery. These criteria do not reflect ecological details about species and are not intended for use in developing a detailed recovery strategy. The broad IUCN criteria are meant to alert countries about the status of species, while the criteria developed by COSEWIC and in SARA are the kind to be used to develop conservation strategies.

The critical habitat (CH) strategy in the plan is inadequate:

- First, it does not spatially identify CH areas on a map. This will make it impossible to manage for CH and ensure adequate protection. In the United States, CH was designated across the listed range of the murrelet (USFWS 2006);
- Second, the CH strategy does not provide for regeneration of habitat in order to provide more habitat in the future. At a minimum, CH should maintain murrelet habitat at current levels, but to provide for recovery more habitat will need to be restored; and
- Third, the CH proposed in this strategy does not include marine habitat. Marine habitat should be added to further ensure recovery. Information is available in many areas, including but not limited to the area around Vancouver Island and in Desolation Sound, where murrelets are known to aggregate (Piatt et al. 2006). These data should be used to add marine CH.

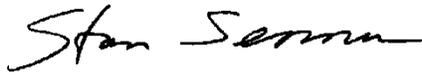
A recovery strategy that may allow a significant decreases in the habitat and populations of a threatened species appears not to be based on science and indeed seems to promote continued degradation of habitat, even though this strategy is supposed to be prepared regardless of economic considerations. As stated in the Evaluation Report on the 5-Year Status Review for the Marbled Murrelet in the United 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. (McShane et al. 2004: 6-34)

The same will be true in British Columbia given the significant loss of older-aged forests and fragmentation of the landscape (Burger 2002, Piatt et al. 2006). To adequately provide for murrelets in British Columbia, the amount and distribution of suitable nesting habitat should be increased across their range.

In conclusion, we strongly encourage you to strengthen the Recovery Strategy by considering and adopting measures to focused on increasing Marbled Murrelet habitat and populations. Thank you for this opportunity to provide comments, and please let us know if PSG and our members can provide further assistance.

Sincerely,



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- USFWS. 2006. Endangered and threatened wildlife and plants; designation of critical habitat for the Marbled Murrelet; proposed rule. Federal Register 71: 53838-53951.