

# Pacific Seabird Group



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

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8 July 2016

Dr. Caren Braby  
Marine Resources Program  
Oregon Department of Fish and Wildlife  
2040 SE Marine Science Drive  
Newport, OR 97365  
(541) 867-4741

RE: Draft Oregon Forage Fish Management

Dear Dr. Braby,

On behalf of the Pacific Seabird Group (PSG), thank you for the opportunity to review the Oregon Department of Fish and Wildlife (ODFW) draft Oregon Forage Fish Management Plan dated 15 June 2016. The PSG supports this draft plan and endorses the goal of protecting forage fish in states, though we believe the plan can be strengthened.

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 the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, South Korea, and the U.S. The PSG's members include biologists and other 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.

More than half of 54 species of North American seabirds are of high conservation concern because of small and declining populations, small ranges or severe threats to

their habitats.<sup>1</sup> Oregon is fortunate to support about 1.3 million colony-nesting seabirds, which represent more than half of all nesting seabirds along the Pacific Coast of the Lower 48 states<sup>2</sup>. The most numerous breeding seabird in Oregon, the Common Murre, depends heavily on some of the six species of forage fish covered in this draft plan, including Osmerid smelt and Pacific sand lance<sup>3</sup>. Pacific sand lance are also a key food source for the federally-listed Marbled Murrelet during the breeding season<sup>4</sup> when they're provisioning their young.

The PSG had previously supported Comprehensive Ecosystem-Based Amendment 1, which was adopted by the Pacific Fishery Management Council, and this draft plan now extends forage fish protections recently adopted for federal waters to Oregon's marine waters. This draft plan reflects precautionary and ecosystem-based approaches to fish management to help ensure that the forage fish covered in this plan will have proper safeguards and the requirements of their predators, including seabirds, marine mammals, and larger fish species are taken into consideration in subsequent management decisions. We also are encouraged to see full accounting of all landed catch on fish tickets and new sorting requirements for Humboldt squid. These steps will ensure a more accurate reporting of forage fish bycatch.

In regard to consideration of new directed commercial harvests on forage fish, PSG appreciates the intent to assess the adequacy of scientific data on the proposed fishery activity and the potential impacts of the new fishing activity on existing fisheries and ecosystem function. However, it would be helpful in the final plan to lay out a clear process and criteria for doing so. Reference is made to the consideration of such new fisheries in federal waters, and we suggest that the process and criteria adopted by the Pacific Fishery Management Council for exempted fishery permits can serve as useful guidance (<http://www.pcouncil.org/wp-content/uploads/2015/12/cop24.pdf>). In addition, we suggest consideration of the following requirements:

- An abundance/stock assessment in Oregon nearshore waters;
- An assessment of relevant ecology and habitat associations, including the distribution and importance of spawning areas;
- A thorough assessment of threats and how to limit those threats in essential habitats throughout the species' entire life cycle.

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<sup>1</sup> North American Bird Conservation Initiative. 2016. The state of North America's birds 2016. Environment and Climate Change Canada: Ottawa, Ontario. 8 pp. [www.stateofthebirds.org](http://www.stateofthebirds.org)

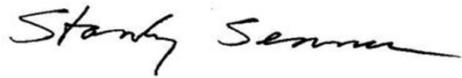
<sup>2</sup> USFWS 2007. Catalog of Oregon Seabird Colonies. Biological Technical Publication BTP-R 1009-2007.

<sup>3</sup> Suryan, R., et al. (2013). Yaquina Head seabird colony monitoring 2013 season summary. Unpublished Report. Oregon State University, Hatfield Marine Science Center, Newport, OR, 10pp.

<sup>4</sup> Nelson, S. K. 1997. Marbled Murrelet (*Brachyramphus marmoratus*), The Birds of North America Online (A. Poole, Ed.). Ithaca: Cornell Lab of Ornithology; Retrieved from the Birds of North America Online: <http://bna.birds.cornell.edu/bna/species/276>. doi:10.2173/bna.276

Thank you again for this opportunity to comment on the draft Forage Fish Management Plan for Oregon. The PSG supports ODFW's intent to extend forage fish protections from federal to state waters, and we encourage you to take further steps to strengthen the plan. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Stanley Senner". The signature is written in a cursive style with a long, sweeping underline.

Stanley Senner  
Vice-Chair for Conservation  
Pacific Seabird Group  
111 SW Columbia St., Suite 200  
Portland, OR 97201