## Pacific Seabird Group



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

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February 4, 2011

Geoff Haskett Alaska Regional Director U.S. Fish and Wildlife Service 1011 East Tudor Road Anchorage, AK 99503

Re: ESA Status of the Kittlitz's Murrelet

Dear Mr. Haskett:

On behalf of the Pacific Seabird Group (PSG), we want to express our concern about the status of Kittlitz's Murrelet (*Brachyramphus brevirostris*). 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, and the USA. PSG's 600 members include 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. The primary goals of PSG are to promote the conservation of seabirds through seabird research, information exchange, and providing expert advice on evaluating and managing threats to seabird populations. PSG has long had an interest in species that seem to be threatened or endangered throughout the Pacific. In August 2008, PSG formed the Kittlitz's Murrelet Technical Committee to begin addressing conservation issues related to this unique species. The Committee consists of 65 members from state and federal agencies, universities, and private organizations and aims to serve as a technical authority on the species while acting as a liaison between research and management.

PSG wrote to the Alaska Department of Fish and Game on 20 March 2009 and supported listing this species under the State of Alaska Endangered Species Act. We also urged the State of Alaska to conduct a status review and to invite the active participation of scientists and those who might be affected by any management program that might result from a determination that this species should be listed. We specifically listed several research, monitoring, and information needs that would contribute significantly to the conservation and management of Kittlitz's Murrelets in Alaska. The Alaska Department of Fish and Game declined to list this

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species under its statute, but did initiate an independent review of available survey data used to estimate Kittlitz's Murrelet population trends in Alaska (scheduled to be complete by June 2011).

Relative to many other seabirds, little is known about the life history, marine and terrestrial habitat requirements, and ecology of Kittlitz's Murrelets. Populations are geographically clustered and are small in size; the current world population is estimated to be between 30,900 and 56,800 individuals (USFWS 2010). During the breeding season, this non-colonial species often feeds in coastal waters associated with tidewater glaciers, outflows of glacial streams, and recently-deglaciated areas, but also occurs in smaller numbers in marine waters adjacent to the Aleutian Islands and in northern Alaska (Day et al. 1999). In glacial fjords of south-central Alaska, Arimitsu (2009) found that Kittlitz's Murrelets were more likely to occur near tidewater glaciers where near surface prey was abundant. Throughout the year, they feed primarily on schooling forage fishes (e.g., Pacific sand lance, Pacific herring, capelin) and large zooplankton (e.g., euphausiids and copepods). The timing and route of migration and the winter range of the Kittlitz's Murrelet are poorly known, although recent satellite telemetry data confirms that this species leaves the glaciated fjords of south-central and southeastern Alaska in the late summer and fall and flies directly to the southern Bering Sea where the sea ice edge extends in the winter months (J. Piatt, U.S. Geological Survey, unpublished data). Kittlitz's Murrelets do not breed until 2-4 years of age, lay only one egg/clutch, and may not breed every year (Day et al. 1999. Day and Nigro 2004). We also suspect that, in some years, there is widespread absence of breeding effort in this species (Day and Nigro 2004), and there is scattered evidence suggesting poor recruitment even in years in which birds breed. For these reasons, we suspect that recovery of declining populations can be expected to be slow, even with effective actions taken to stem the decline. The U.S. Fish & Wildlife Service has concluded that causes for decline include oilspill mortality (especially the Exxon Valdez oil spill), oil pollution, changes in climate manifested through glacial recession and associated cascading effects, gillnet bycatch mortality, vessel-caused disturbance, and reduced availability of preferred prey (USFWS 2010).

In the short term, Kittlitz's Murrelet populations will be most responsive to management actions that reduce direct mortality and improve survival. One principal threat that can be effectively mitigated is the incidental take of murrelets that occurs in some commercial salmon gillnet fisheries managed by the State of Alaska (Wynne et al. 1991, Wynne et al. 1992, Manly 2007). As part of the National Marine Fisheries Service's Alaska Marine Mammal Observer Program, seabird bycatch is sampled in all areas where gillnet monitoring has occurred in Alaska. In those studies, Kittlitz's Murrelet mortalities have been recorded in both driftnets and set-nets. An accurate statewide mortality estimate from salmon gillnet fisheries does not exist because not all gillnet fisheries have been sampled. Kittlitz's Murrelets also would benefit in the short term from oil-spill prevention and response planning, reducing human activities that artificially increase populations of predators (e.g., bald eagles), avoiding the disturbance of nesting birds, protecting nesting and foraging habitats, and minimizing vessel-caused disturbance in favored foraging areas (e.g., near glaciers frequented by sight-seeing tour vessels).

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PSG supports the evaluation for listing of the Kittlitz's Murrelet under the U.S. Endangered Species Act. We understand that all federal agencies are currently being funded under a continuing resolution, so that it may be difficult to make specific personnel and budget commitments until the Service's overall budget situation is resolved. We urge the U.S. Fish and Wildlife Service to move forward with a proposed rule for this species and to base its decision on the very best scientific information that is available. Most biologists who are familiar with this species recognize the difficulties in estimating population trends for this highly mobile species and believe that assessing reproductive success and survival must be considered in your decisions. In February 2010, PSG sponsored a symposium to summarize the status and trends of Kittlitz's Murrelet in Alaska and Russia; peer-reviewed proceedings from this symposium will be available within the next few months. We hope these proceedings will assist you in reaching a decision based on the best available science.

We look forward to contributing information to assist in the preparation of a proposed rule for the Kittlitz's Murrelet. Please let us know of any assistance we can provide.

Sincerely,

Craig S. Harrison
Vice Chair for Conservation

Craig S. 1

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