



Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive
Salem, OR 97302

March 28, 2017

Re: Notification of Marbled Murrelet Status Review and Consultation Pursuant to ORS 496.176(4) and ORS 635-100-0105(10)

The Pacific Seabird Group recommends upgrading the status of the Marbled Murrelet from “Threatened” to “Endangered” based on extensive, on-going studies of the Oregon population of the Marbled Murrelet by our members.

The Pacific Seabird Group (PSG) is an international, non-profit organization that was founded in 1972 to promote knowledge, study, and conservation of Pacific seabirds with a membership drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. Over the years, PSG has been a leader in conservation, developing the monitoring protocols and convening a standing Marbled Murrelet Technical Committee. Collectively, the Group's members have a great deal of knowledge and experience with respect to Marbled Murrelet conservation in the Pacific Region.

The Oregon Fish and Wildlife Department evaluation of the status review of the Marbled Murrelet currently lists it as threatened under the Oregon Endangered Species Act of 1992. Since this listing, habitat loss and mortality at sea have further diminished the Oregon population, as they have to the neighboring populations. The species is currently listed as “Endangered” in Washington and California, and we believe the species merits this uplisting in Oregon based on the same criteria for reclassification.

In particular, logging old growth and older-aged forests, including known occupied sites, continues in Oregon and appears to be increasing in certain watersheds jeopardizing nesting habitat quantity and quality. The Oregon Department of Forestry and Department of State Lands formerly operated under a Habitat Conservation Plan for the 93,000 acre Elliott State Forest that provided a 50-year plan for forest recovery and maintenance of murrelet habitat. However, the State abandoned that plan, opting for logging in and around known occupied murrelet nesting sites. Logging in this Forest presents a significant loss of habitat to the murrelet, and we applaud the cessation of logging on the Benson Ridge and other sold sales in December 2016.

Existing state and federal regulations are currently inadequate to protect the species, especially on private and state lands in Oregon. The level of habitat loss on state lands in Oregon would not have been so high if the species had been listed as “Endangered,” which is warranted now with this action. Similar land management practices in suitable habitat in adjoining states have led to severe

population losses, and the Marbled Murrelet has the likelihood of extinction throughout a significant portion of its range if changes are not made immediately in Oregon. The documented decline of the Marbled Murrelet in Oregon since its state listing as “Threatened” demonstrates that the species is not receiving the protections it needs. Because Marbled Murrelet nests are dispersed and difficult to locate in mature coastal forests, most research on overall abundance and reproductive output is conducted at sea, where the birds are more easily seen and concentrated within a few km of shore on the open coast (Miller et al. 2006). Standardized boat transects to survey murrelets on the central Oregon coast produced evidence of a sharp decline in numbers from 1992 to 1999 (Strong 2003). The significant decrease in numbers occurred during and following 1996, four years after federal listing of the Marbled Murrelet. The 1992 federal listings halted some timber harvest operations in murrelet habitat (primarily on federal lands), but population effects from past logging may not have been seen until the middle of the decade, when the sharp drop in numbers occurred. Similarly, there is likely a lag effect from recent and continuing loss of habitat on the remaining populations in Oregon.

The population monitoring component of the Northwest Forest Plan formalized and standardized at-sea surveys for murrelets on the west coast beginning in 2000. From 2000 to 2010, the plan documented a continuing decline in murrelet numbers in Oregon (Miller et al 2012). Population estimates in Oregon have become more variable in recent years though loss of nesting habitat has continued due to wildfire and timber harvest (Falxa and Raphael 2016). Research from the Northwest Forest Plan demonstrated an extremely close relationship between high quality nesting habitat and abundance at-sea associated with that forest habitat (Raphael et al 2015). Where climate change impacts are largely beyond the control of management actions in the short term, the PSG feels that additional protections afforded by an Oregon Endangered Species listing is the best means of slowing or reversing the decline in the Marbled Murrelet population in Oregon.

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Thank you for your consideration.

A handwritten signature in black ink, reading "Mark J. Rauzon". The signature is fluid and cursive, with the first name "Mark" and last name "Rauzon" clearly legible.

Mark J. Rauzon
Vice-Chair for Conservation
Pacific Seabird Group

Literature cited:

Falxa, G.A. and M.G. Raphael (Eds) Northwest Forest Plan - the first 20 years (1993-2013): Status and trends of Marbled Murrelet populations and nesting habitat. USDA Gen. Tech Report PNW-GTR-933.

Miller, S.L., C.J. Ralph, M.G. Raphael, C. Strong, C. Thompson, J. Baldwin, M. H. Huff, and G.A. Falxa. 2006. At-sea monitoring of Marbled Murrelet population status and trend in the Northwest Forest Plan area. Chapter 3 *In* Northwest Forest Plan- The first 10 years (1994 - 2003): Status and trends of populations and nesting habitat for the Marbled Murrelet. Gen. Tech. Rep. PNW-GTR-650. 149 p

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Raphael, M.G., A.J. Shirk, G.A. Falxa and S.F. Pearson. 2015. Habitat associations of marbled murrelets during the nesting season in nearshore waters along the Washington to California coast. *J. Marine Systems* 146: 17–25.

Strong, C.S. 2003. Decline of the Marbled Murrelet population on the Central Oregon coast during the 1990's. *Northwestern Naturalist*. 84:31-37.