



2 October 2020

Oregon Board of Forestry
2600 State Street
Salem, OR 97310
503-945-7210
boardofforestry@oregon.gov

RE: Habitat Conservation Plan for western Oregon State Forests

To the Oregon Board of Forestry:

The Pacific Seabird Group (PSG) urges the Oregon Board of Forestry to proceed with approving a Habitat Conservation Plan (HCP) for the western Oregon State Forests. However, we have some concerns about the HCP and its ability to protect the federally threatened Marbled Murrelet (*Brachyramphus marmoratus*), along with other sensitive and threatened species including, but not limited to, the Northern Spotted Owl, multiple salmon species, Pacific Marten and Fisher.

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. 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. PSG has served as an unbiased forum for government, university, and private sector biologists to discuss and resolve issues related to Marbled Murrelet conservation along the Pacific coast of North America.

The planned Habitat Conservation Areas (HCAs) and Riparian Conservation Areas (RCAs) protect some large areas in the Oregon Coast Range that are important to the murrelet. We applaud ODF in choosing to provide reserves for murrelets and salmon, but we recommend that the following changes be made in order to ensure murrelet survival into the future:

- (1) Refrain from logging any older (≥ 80 year-old) forest stands within and outside of the proposed HCAs and RCAs and include all older forest stands in additional HCAs.
- (2) Minimize fragmentation of the landscape by shifting HCAs in some areas to create larger, contiguous blocks of habitat. As currently arranged, the HCAs are spread out over the landscape, with some being too small to provide adequate protection to murrelets.
- (3) Demonstrate that the immediate impacts to murrelets by logging their habitat will not affect their short-term survival. Creating reserves (HCAs) is a long-term goal and will not


benefit the murrelet for many, many years, thus not really ameliorating the short-term impacts. How has it been determined that the species will not be adversely affected by all of the short-term impacts? The information in the HCP does not adequately address this issue.

- (4) Protect a larger area along both sides of streams (at least 100m on each side for 200m width total) to buffer this important murrelet habitat from elevated temperature and other edge effects. Some current murrelet nesting areas are along streams where trees were left during previous logging. It is important that these areas have greater protection; more trees will buffer the murrelet nesting habitat from predators and other impacts.
- (5) Minimize disturbance to murrelets by prohibiting some recreation within the RCAs and HCAs. Certainly off-road vehicle use should not be allowed in these conservation areas. There may be other activities that could be minimized in these areas to reduce disturbance to murrelets.

We strongly encourage the Oregon Board of Forestry to approve the HCP after making the above changes in order to ensure both the short-term and long-term survival of Marbled Murrelets. Without these changes, the HCP will not be protecting imperiled species such as the murrelet.

Please contact us if you need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Peter J. Hodum".

Peter Hodum
Vice Chair for Conservation
Pacific Seabird Group