



Juliet Lamb

PSG 2024 Meeting Chair
Chair@pacificseabirdgroup.org

Dan Barton

PSG 2024 Meeting Chair-Elect and Scientific Program Chair
Programchair@pacificseabirdgroup.org

Richard Veit

PSG 2024 Meeting Past Chair and Awards Committee Chair
Pastchair@pacificseabirds.org

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California Fish and Game Commission
Marine Resources Committee
715 P Street, 16th Floor
Sacramento, CA 95814

To: California Fish and Game Commission and the Marine Resources Committee

Subject: Market Squid Fishery Management Review: Seabird Protection within Channel Islands National Park and Channel Islands National Marine Sanctuary.

The Pacific Seabird Group supports the option developed during the Squid Fishery Management Review process to enact a seasonal prohibition of night-time fishing around Santa Barbara, Anacapa, and San Miguel Islands to protect the breeding grounds of the Scripps's Murrelet. As detailed below, the use of high intensity lighting during night squid fishing poses a distinct threat to this threatened nocturnal bird which relies on natural patterns of light and dark for essential breeding and rearing functions. California Fish and Game Commission has this rare opportunity to both maintain an economically sustainable squid fishery while protecting the natural diversity and abundance of marine life, and the structure, function and integrity of marine ecosystems.

The Pacific Seabird Group (PSG) is a society of professional seabird researchers and managers dedicated to the study and conservation of seabirds. PSG was formed in 1972 out of a need for increased communication among academic and government seabird researchers.

The principal goals of PSG are (1) to increase the quality and quantity of seabird research through facilitating exchange of information and (2) to identify and assess the importance of threats to seabird populations and provide government agencies and others with expert advice on managing the threats and populations.

Over the past year members of PSG have been in consultation with one of the members of the Squid Fishery Advisory Committee (SFAC). It is our understanding that a proposal was presented to the SFAC that called for the closure of night-time fishing within the Channel Islands National Park and Sanctuary.

We support this proposal for the following reasons:

1. The Scripps's murrelet is a State-listed threatened species. Eighty percent (80%) of the United States population nests within Channel Islands National Park. The primary nesting locations are Santa Barbara, Anacapa, and San Miguel Islands. Santa Barbara Island has the largest Scripps's murrelet colony in the United States, and possibly the world.
2. The National Park Service continues to invest significantly in protecting the Scripps's murrelet by eradicating invasive predators like the black rat, restoring nesting habitat on Santa Barbara and Anacapa islands, conducting seabird monitoring and reducing island-based lighting during nesting season. Partner agencies must contribute protections of their own also.
3. The Scripps's murrelet is a nocturnal seabird. Artificial lights at night cause high mortality of nocturnal seabirds, one of the most endangered groups of birds globally. There are two primary causes of mortality: 1) Fledglings of burrow-nesting seabirds, and to a lesser extent adults, are attracted to and then grounded (i.e., forced to land) by lights when they fly at night. 2) Increased predation by predatory birds (including barn owls and gulls) (Rodríguez et al. 2019). The Commission has taken action to require shielding around the high-powered lights used in the fishery, however these actions do not prevent the scattering of artificial lights, especially during periods of fog and varied sea-state. Shielding, even when the shields extend beyond the tip of the bulb, doesn't prevent the reflection and scattering of horizontally.
4. The proposed closure would have little to no effect on the squid fishery. The vast majority of commercial fishing occurs in California, traditionally in shallow waters, less than 70 m, and focuses on spawning adults (Zeidberg et al., 2006). The locations that have yielded the largest tonnage are near the islands of Santa Cruz, Santa Rosa, and Santa Catalina, and just offshore of Port Hueneme and Monterey. A significant amount of catch occurs within the boundaries of Channel Islands National Park and Channel Islands National Marine Sanctuary. Vessel participation is greatest during the late fall and early winter for southern California (Zeidberg et al. 2006). The southern portion of the fishery encompasses most of the Southern California Bight including the northern and southern Channel Islands southward along the coast to La Jolla and is most active from October to February. During this time there is less stratification of the water column and more mixing due to winter storms and colder air temperatures (Zeidberg et al. 2006). Current harvest information provided by the Department continues to reinforce the height of the season around the Channel Islands. The closure as called for:
 - a. Only prohibits night-time fishing and the use of artificial lights around Santa Barbara, Anacapa, and San Miguel Islands. The critical period necessary to protect the breeding/nesting/fledgling period of the State-listed threatened Scripps's Murrelet is February through October.
 - i. The prohibition would be in place (February through October) outside of the highest season of market squid harvest (late fall through early winter).

- b. It does not prohibit daytime fishing around Santa Barbara, Anacapa, and San Miguel Islands.
- c. The proposal does not call for prohibiting or restricting the fishery around Santa Cruz and Santa Rosa Islands where landings are the greatest.

Additionally, we have reviewed a draft version of a management plan for Synthliboramphus Murrelets currently in the final stages of preparation for publication by the Channel Islands National Park, California Institute of Environmental Studies, and other partners. This plan is the most comprehensive existing review of the threats to Scripps Murrelets and contains the same recommendations that we are supporting above.

In closing, we want to thank the Commission for actions they have taken to protect and manage California's marine ecosystems with the creation of marine protected areas and special closures. However, when it comes to protecting the Scripps's murrelet not enough has been done to protect this State-listed threatened species. In 2004, the Commission prohibited the take of market squid for commercial purposes using attracting lights in all waters of the Gulf of the Farallones National Marine Sanctuary. This regulation also applies to vessels pursuing squid for live bait purposes. It's time to do the same on a more limited basis to protect the State-listed threatened Scripps's murrelet within an area that we as American's set aside for future generations – Channel Islands National Park and Channel Islands National Marine Sanctuary.

Sincerely,

Lindsay Adrean
PSG 2024 Vice Chair for Conservation
conservation@pacificseabirdgroup.org