



Dr. Donald E. Lyons

2026 Chair

chair@pacificseabirdgroup.org

Dr. Thomas P. Good

2026 Chair-Elect and Scientific Program Chair

chairelect@pacificseabirdgroup.org

Dr. Daniel C. Barton

2026 Past Chair and Awards Committee Chair

pastchair@pacificseabirds.org

March 20, 2026

Ms. Kimberly Prill, BLM Oregon and Washington State Director

Bureau of Land Management

Attention BLM OR930

1220 SW 3rd Ave

Portland, OR 97204

BLM_OR_Revision_Scoping@blm.gov

Dear Ms. Prill,

The Pacific Seabird Group (PSG) is a society of professional seabird researchers and managers dedicated to the study and conservation of seabirds. PSG was incorporated as a 501c3 non-profit in the state of California in 1972 and has an international membership from countries throughout the Pacific Basin and beyond. The principal goals of PSG are to: 1) increase the quality and quantity of seabird research by facilitating the exchange of information, 2) identify and assess the importance of threats to seabird populations, and 3) provide government agencies and others with expert advice on managing threats and populations. Over the last several decades, PSG members have provided Marbled Murrelet population status information, standardized monitoring protocols for at-sea and forest-based monitoring and assessed management alternatives for state and federal agencies and other constituents.

The revision of the Northwestern and Coastal Oregon Resource Management Plan and Southwestern Oregon Resource Management Plan (RMPs) will affect lands containing breeding habitat of the threatened Marbled Murrelet. This species requires late successional coastal forests for nesting. It is the loss of this habitat type that contributed to the decline of the Washington, Oregon, and California population and listing of this Distinct Population Segment as threatened under the U.S. Endangered Species Act (ESA). Timber harvest in occupied sites causes direct harm to murrelets given the species' need for large lateral branches that are not found in other forest types and the majority of potential habitat available. At least 70% of the former old-growth and older forests have been lost to logging and development across the Pacific Northwest.

As required under the ESA, take of the Marbled Murrelet is prohibited and Critical Habitat has been designated. As a federal agency, the Bureau of Land Management (BLM) must comply with the ESA and protect murrelets and their nesting habitat. Therefore, the BLM must consult with the U.S. Fish and Wildlife Service to ensure that Marbled Murrelet Critical Habitat is not destroyed or modified as a result of RMP-sanctioned activities. An appropriate consultation will identify all Areas of Critical Environmental Concern (ACECs) that contain or are adjacent to Marbled Murrelet Critical Habitat, or have records of murrelet presence, and remove those areas from potentially damaging RMP-sanctioned activities. The following list contains examples of Oregon ACECs that overlap or are adjacent to Marbled Murrelet Critical Habitat or have records of murrelet presence from prior surveys. There may be other ACECs or BLM lands meeting these criteria. Consequently, we recommend a thorough GIS analysis including Critical Habitat, late successional forest, and murrelet survey database layers to identify all BLM lands and ACECs of importance to murrelets.

- Bushnell-Irwin Rocks
- Cherry Creek RNA
- China Wall
- Elk Creek
- Forest Peak
- Grass Mountain
- High Peak-Moon Creek
- Hunter Creek Bog
- Lake Creek Falls
- Mary's Peak
- Nestucca River
- North Fork Chetco RNA
- North Fork Coquille
- North Fork Hunter Creek
- Rickreall Ridge
- Rough and Ready Creek
- Saddle Bag Mountain RNA
- Tioga Creek
- Upper Rock Creek
- Valley of the Giants
- Wassen Creek
- Sheridan Peak
- Little Grass Mountain
- Hult Marsh
- Umpqua River Wildlife Area – Martin Creek
- Umpqua River Wildlife Area – Brads Creek
- Umpqua River Wildlife Area – Cougar Creek
- Umpqua River Wildlife Area – Lost Creek
- Umpqua River Wildlife Area – Golden Bar
- Umpqua River Wildlife Area – Woodruff Mountain

Identification and preservation of all high quality and suitable nesting habitat including known nest sites or occupied sites that fall within or outside of the Critical Habitat boundaries will allow BLM to avoid take of murrelets and comply with the ESA. Nest site location information is available from the Oregon Biodiversity Information Center, Oregon State University and the U.S. Forest Service Pacific Northwest Research Station. The BLM, U.S Forest Service, Oregon Department of Forestry, and U.S. Fish and Wildlife Service's internal records of murrelet surveys should also be consulted for presence and occupancy locations. For more information on data sets/layers, feel free to contact the co-chairs of the PSG Marbled Murrelet Technical Committee, Lindsay Adrean (ladrean@abcbirds.org) and Bill McIver (bill_mciver@fws.gov).

Additionally, we strongly encourage the BLM to incorporate the recommendations found in the Pacific Seabird Group technical document titled "*Terrestrial Habitat Management*

Recommendations for Marbled Murrelets” into the RMPs (<https://pacificseabirdgroup.org/wp-content/uploads/2024/02/Terrestrial-Habitat-Management-Recommendations-for-MAMU-2024.pdf>). This document was developed by the Pacific Seabird Group’s Marbled Murrelet Technical Committee and provides the most current information to support recovery of the Marbled Murrelet while undertaking land management activities. Some of the pertinent recommendations from this document are listed here:

- Surround all murrelet nesting habitat with a 100 m wide no-cut buffer, at minimum;
- Seek to create and maintain large, contiguous areas of murrelet habitat. Effects to murrelets due to hard edges decrease in larger, more circular areas of habitat;
- When harvesting timber adjacent to occupied habitat and buffers, avoid or reduce negative effects to murrelets or their habitat by minimizing the extent of hard edge present at any given time.

Thank you for your consideration of our comments. If you have any questions about these comments or seek additional information about Marbled Murrelets, please contact the co-chairs of the PSG Marbled Murrelet Technical Committee, Lindsay Adrean (ladrean@abcbirds.org) and Bill McIver (bill_mciver@fws.gov).

Sincerely,

Dr. Donald E. Lyons
2026 Chair, Pacific Seabird Group
chair@pacificseabirdgroup.org

Pacific Seabird Group. 2024. Terrestrial habitat management recommendations for Marbled Murrelets. Pacific Seabird Group Technical Publication Number 7. 38p. Available at <https://pacificseabirdgroup.org/psg-publications/technical-publications/>