

**Pacific
Seabird
Group**



1991

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

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RECEIVED

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Edward W. Shepard, State Director
Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland, OR 97208

RE: Comments on the Draft EIS for the BLM Western Oregon Plan Revision

Dear Mr. Shepard:

On behalf of the Pacific Seabird Group (PSG), we express extreme concern about the BLM's Western Oregon Plan Revision with respect to the Marbled Murrelet (*Brachyramphus marmoratus*), which is currently listed as threatened under the federal Endangered Species Act (ESA). The plan would eliminate designated late-successional reserves [LSRs] established under the Northwest Forest Plan and allow increased logging in older-aged forests (mature, old-growth, late successional). The LSRs and all remaining older-aged forests are critical for the survival and recovery of the Marbled Murrelet. We strongly oppose the preferred alternative (and the other alternatives) and suggest that BLM maintain all of the existing LSRs, older-aged forests, riparian reserves, and other habitat features that are critical to the survival and recovery of this threatened species.

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. 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. For two decades, PSG has taken an active lead in resolving many scientific aspects of the biology and conservation of Marbled Murrelets. PSG has served as an unbiased forum for government, university, and private sector biologists to discuss and resolve such issues.

The Marbled Murrelet was listed in 1992 primarily because of significant losses of nesting habitat through logging and development in coastal forests of Washington, Oregon, and California (USFWS 1992). An objective of the Marbled Murrelet recovery plan (USFWS 1997) is to stabilize the population at or near current levels by maintaining and/or increasing productivity and removing and/or minimizing threats to survivorship. Protecting terrestrial habitat, including maintaining essential nesting habitat on Federal lands (LSRs and occupied sites), minimizing the loss of suitable but unoccupied habitat, creating and maintaining large blocks of contiguous forest cover, and maintaining and enhancing buffer habitat, is essential for the long-term recovery of this species (USFWS 1997; 131-146). The USFWS (1996, 1997, 2006) clearly states that the Northwest Forest Plan especially the LSRs, is the backbone of the murrelet recovery plan. Without the LSRs, the demise of the murrelet population in Oregon will likely be accelerated.

“Within the range of the marbled murrelet, the Northwest Forest Plan designates a system of Late-Successional Reserves, which provides large areas expected to eventually develop into contiguous, unfragmented forest. ... The Service recognizes the value of the Northwest Forest Plan and acknowledges its integral role in marbled murrelet conservation. The Northwest Forest Plan complements this critical habitat designation by stressing the need for protection of large, unfragmented areas of suitable nesting habitat that are well distributed throughout the species’ range, with special emphasis on areas close to the marine environment (USFWS 1996: 26262)”.

Marbled Murrelet Habitat Continues to Decline

Despite the listing of the Marbled Murrelet as threatened in 1992 and the implementation of the Northwest Forest Plan in 1993, the amount of suitable murrelet habitat has continued to decline throughout their range. The loss and degradation of habitat has resulted from: (1) harvesting on private and state lands; (2) federal/private land exchanges; (3) thinning in suitable and occupied habitat, and buffers to suitable habitat; (4) habitat conservation plans; (5) fragmentation effects from adjacent harvests and thinnings; and (6) a variety of natural and anthropogenic causes including fire, windthrow, and disturbance. Between 1992 and 2003 the total loss of suitable nesting habitat was estimated to be about 10% or 226,000 acres of the estimated of 2.2 million acres of suitable habitat within the listed range (2003 estimate; McShane et al. 2004). Of this habitat, most was lost in formal consultations with the USFWS (92%), 80% on private land (71% on lands covered by HCPs) and 17% (34,951 acres) on federal land. More than 7,370 acres of occupied habitat were lost, and thousands of additional lost acres, which were not surveyed, likely contained murrelets. Under the Northwest Forest Plan, HCPs and other habitat management plans, new murrelet habitat will not be suitable for 50-200 years. The inability to create new murrelet habitat in the short term combined with the continued harvesting of occupied and suitable habitat ensures a downward trend in suitable murrelet habitat into the future.

The amount of mature and old-growth habitat suitable for murrelet nesting in coastal areas is significantly below historic minimums. For example, using a model based on historic fire size and historic fire frequency, Wimberly et al. (2000) estimated the mean percentage of old growth and late successional forest in the Oregon Coast Range during the last 3000 years. At the province scale, the mean percentage of old growth and late successional forest in the Oregon Coast Range was estimated at between 39 and 55%, and 66 and 76%, respectively. Currently the entire Coast Range province contains only approximately 5% old growth and 11% late successional forests.

The Northwest Forest Plan was created to protect these remaining older-aged forests which are critical for nesting Marbled Murrelets, and foraging and breeding habitat for other old-growth dependent species. The Draft EIS proposes to circumvent the Northwest Forest Plan and allow a dramatic increase in logging of older-aged forests throughout western Oregon, including a 700% increase in harvest of old-growth forests. More than 200 square miles of older-aged forests would be targeted for clearcutting. The preferred alternative and other alternatives in the Draft EIS allow unacceptable levels of logging that would prevent the recovery of the Marbled Murrelet in Oregon.

Marbled Murrelet Populations Continue to Decline

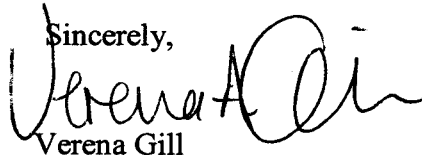
The Washington, Oregon, and California murrelet population is estimated to be 22,000 birds (McShane et al. 2004). Population modeling indicates that this population is declining and will be extinct in Oregon and California within 100 years without changes in the amount and quality of nesting habitat, and in demographic trends (McShane et al. 2004). Low fecundity levels across Washington, Oregon, and California as measured by nest success indicate a population that cannot currently maintain itself (McShane et al. 2004, Beissinger and Peery 2003). Lower nest success is caused primarily by nest predation, which in turn is affected by forest fragmentation and proximity to human developments (McShane et al 2004, Raphael et al. 2002). Thus, in order to diminish the threat of nest predation and increase murrelet reproduction, the forest landscape and its surroundings must be protected to provide large, contiguous blocks of suitable nesting habitat.

In summary: (1) murrelet populations continue to decline through low fecundity and high predation rates; (2) even with the current system of reserves (LSRs) and critical habitat units (CHUs) on federal land, loss of occupied and suitable murrelet habitat is continuing; and (3) murrelet habitat declines will accelerate in the future with proposed changes to the LSRs and the Northwest Forest Plan. Continued habitat loss and the continued fragmentation of habitat will increase the risk of extinction of this unique seabird. We agree with the Evaluation Report on the 5-Year Status Review for the murrelet that:

“It is unrealistic to expect that the species will recover before there is significant improvement in the amount and distribution of suitable nesting habitat” (McShane et al. 2004: 6-34).

We believe the BLM proposal to eliminate most of the LSRs, and heavily log older-aged forests, is not appropriate considering the current status of the population and threats posed to the population at this time. To provide for the survival and recovery of the Marbled Murrelet, it is critical that BLM reconsider all of the alternatives and design an alternative that prevents any further loss of suitable habitat while creating additional suitable habitat in the shortest time frame possible. Without these protections, the Marbled Murrelet is likely to become extinct in Oregon in the foreseeable future.

Sincerely,



Verena Gill

Chair, Pacific Seabird Group

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