



Kalmiopsis Audubon Society
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Greetings:

I am writing on behalf of the Kalmiopsis Audubon Society based on the south Oregon coast. Our group has 175 members who are very concerned about habitat for fish, birds, and wildlife, and so we are very concerned by the petition to de-list the California/Oregon/Washington population of the Marbled Murrelet (MAMU) from the Threatened species list.

We know the marbled murrelet firsthand as a fascinating bird that nests in old-growth forests near where we live. Every summer, our members get up early to watch marbled murrelets fly to the sea at dawn, appreciating the way this little bird is so carefully suited to its place, so dependent on old-tress with fat branches for their nesting. These birds are an important part of what makes Oregon's remaining old-growth forests so extraordinary.

Unfortunately, since the marbled murrelet has been listed as a threatened species in 1992, its population has only continued to decline. Moreover, threats to the birds' existence have increased, and threats have not been adequately addressed to reverse the trend of population decline.

Distinctness of the California-Oregon-Washington MAMU population

The 3-state population of the Marbled Murrelet is significant to the species as a whole because loss of the discrete population segment would result in a significant gap in the range of the bird, and because some populations differ markedly from other populations in their genetic characteristics. Given increasing threats across the range (see below), protection of this population is essential to preserve genetic diversity of the species.

Status distribution and population trends of the Marbled Murrelet

Since the MAMU has been listed as a threatened species, its population has continued to decline, and there has been no evidence of any increase throughout the breeding range. In Oregon, major population declines have been documented over a decade or more. Since the time of listing, both suitable breeding habitat and number of occupied sites have declined throughout the 3-state range, and the decline is expected to continue.

(Huff et al. 2006, *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. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. p. 9.)

Threats to Marbled Murrelet and its habitat throughout its range

Since the time of listing, threats to the marbled murrelet have not been reduced, in fact some threats have increased and other new threats have emerged throughout the birds' range and particularly in the range of the California/Oregon/ Washington discrete population.

Loss of habitat

Marbled murrelets are very closely tied to the well being of old-growth forests because they are so dependent on large old trees with broad limbs for nesting. Over the past 15 years, though rates of habitat loss have slowed, the overall amount of old-growth forest suitable for breeding and the number of occupied sites have declined throughout the bird's breeding range.

In our part of the range in southern Oregon, the 2003 Biscuit fire eliminated approximately 15,000 acres of Murrelet habitat.

Also in our part of the range, we have a significant new and pressing threat to MAMU habitat: the Bureau of Land Management's Western Oregon Plan Revision (WOPR)— This plan was developed in a political rather than scientific manner. First the Bush Administration BLM did not defend the Northwest Forest Plan's carefully vetted provisions. Then the WOPR plan was roundly criticized by independent scientists and even agency scientists in its draft form, and there were many reports of science being tampered with to rationalize the action, which will permit the logging of about 100,000 acres of old-growth forests in western Oregon. This would eliminate an estimated 600 MAMU nest sites!!!!

The WOPR would be quite a significant blow to this species which is in trouble and so dependent on old growth forests!

Increased predation

Closely related to habitat loss owing to deforestation is the increased predation that comes when old growth habitat is fragmented by clearcuts. This leads to more and more edge habitat, and the influx of bird species that are known to predate on MAMU eggs such as jays, crows, and ravens.

Some of our members who are engaged in MAMU observation have noted many nest sites in areas of edge habitat because there simply aren't enough high-quality nest sites in well-protected old trees

When marbled murrelets are compelled to nest in areas close to openings, it is far more likely that their nest will be attacked and egg or chick destroyed. And because MAMU invest so much energy into a single egg, this type of predation is particularly detrimental.

Because marbled murrelets are so sensitive to forest fragmentation, increasing loss of old-growth forest amplifies the threat of predation, will reduce breeding success, and ultimately contribute to continuing population declines.

Continued threats of oil spills

Marbled murrelets are threatened not only by loss of their terrestrial nesting sites but also by damage and pollution of their marine feeding habitats. Oil spills continue to pose a threat throughout the range of the Marbled Murrelet, and a single event could kill

hundreds of birds as happened with the wreck of the *New Carissa* in our area in the late 90s. Although oil spills are not a routine occurrence, the rate and likelihood of oil spill threat remains unchanged according to the five-year status review, and we don't see any chance in that assessment.

New threats of disease and of changing ocean conditions

Since the Marbled Murrelet was listed a few new threats have come to light. First, owing to overfishing of species such as sardine and anchovy, there has been concern that the Marbled Murrelets have faced increased difficulty obtaining adequate nutrition as they've been compelled to shift their diet. ("Study finds 'double whammy' harmed murrelet's population," *Oregonian*, Jan. 3, 2006)

Other ecological stresses in the ocean, including pollution, temperature increase, and acidification, continue to stress the prey species that the Marbled Murrelet now depend upon, namely krill and rockfish

Stresses owing to dietary inadequacy make birds more vulnerable to emerging diseases including the West Nile Virus and also Newcastle's disease.

Combined with other environmental stressors such as ocean climate changes and habitat loss, diseases may be especially significant with respect to species with declining populations.

Conclusion

Given the drastic population declines the Marbled Murrelet has undergone throughout its range and the ongoing threats to the species posed by habitat loss, by increased predation, by changing ocean conditions, disease, and more, we think it is clear that the delisting criteria for the California/Oregon/ Washington distinct population have not been met.

For this reason, we believe that Endangered Species Act protection should be retained for the California, Oregon, and Washington Distinct Population Segment of the Marbled Murrelet. If the Fish and Wildlife Service removes protection for the California, Oregon, and Washington distinct population, then we urge the FWS to list the species as endangered in California, Oregon, and Washington. The species should also be listed as threatened in Alaska and British Columbia.

Thank you for considering our comments.

Cordially,



Ann Vileisis

President