

# Pacific Seabird Group



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

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November 18, 2008

Ocean Policy Advisory Council (OPAC)  
635 Capitol St. NE,  
Suite 150  
Salem, Oregon 97301-2540

**Re: Comments on the Proposed Marine Reserves/Marine Protected Areas off Oregon**

Dear Members of the Ocean Policy Advisory Council:

The Pacific Seabird Group (PSG) believes that Oregon's Ocean Policy Advisory Council (OPAC) should consider the needs of marine birds as they undertake marine conservation planning and evaluation in Oregon's Territorial Sea. We recommend that eight of the 20 areas under consideration be designated as Marine Reserves/Marine Protected Areas (MR/MPA) for their ecological importance to seabirds.

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. PSG serves as an unbiased forum for government, university, and private sector biologists to discuss and resolve seabird-related issues.

It is clear from the direction of the West Coast Governor's Agreement on Ocean Health that the time has come to incorporate an ecosystem-based approach to manage species dependent on the California Current System. With this approach in mind, it is critical that you include the following key principles in your efforts to identify ecological areas in our nearshore waters: (1) be holistic,

risk-averse, and adaptive; (2) maintain food–web connections that are essential to the health of the system; and (3) be integrated, interdisciplinary, and inclusive. For example, when fisheries managers consider fish population targets and allowable catches they must maintain an age structure that includes larger and older adults with a goal of maintaining ecosystem resilience.

With over a million birds nesting on the offshore rocks along the Oregon coast, the productivity of our ocean environment and the importance of the California Current System are evident. Marine birds are top predators and as such require healthy stocks of forage fish and invertebrates for their continued success. These resources are patchily distributed and strongly influenced by oceanographic features at a variety of scales. Because of the importance of krill to the marine food chain, the Pacific Fishery Management Council adopted a complete ban of commercial fishing for all species of krill in west coast federal waters and delineated essential habitat for krill. PSG supports this designation and encourages OPAC to recognize this type of ecosystem protection as it considers Marine Reserve designation.

The Important Bird Area program has recognized certain areas of the ocean that are critically important to marine seabirds. Three at-sea areas in Oregon that are outstanding in their importance for foraging seabirds include Astoria Canyon, Heceta/Stonewall/Perpetua Banks, and Cape Blanco/Port Orford Reef. Among the proposals submitted to OPAC during this process, eight areas (including the Audubon sites) should be considered for their ecological importance to seabirds:

- Tillamook Head to Cape Falcon
- Three Arch Rocks area
- Cascade Head
- Cape Perpetua to Heceta Head
- Siltcoos area
- Seven Devils/Cape Arago area
- Port Orford Reef area
- Cape Sebastian/Mack Reef area

Our recommendations are limited to the ecological significance of the areas as they pertain to marine birds and not the social or economic implications of marine reserve designation. But, we believe that ecological health and resilience will lead to economic sustainability. Additional issues for OPAC and the Marine Cabinet to consider include:

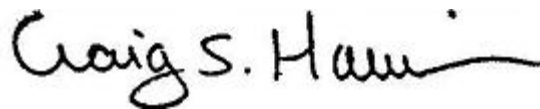
- The ESA-listed Marbled Murrelet (*Brachyramphus marmoratus*) occurs in nearshore waters. In particular, concentrations in the area from Waldport to Florence have consistently been the highest (the proposed Cape Perpetua to Heceta Head MR is located within the area with the highest murrelet populations in Oregon).
- The critical link between the health of forage fish populations and seabird productivity. With the potential for increased aquaculture, the proposal to ban new fisheries for forage fish appears to be a precautionary approach that is consistent with the direction put forward by Governor Kulongoski and the West Coast Governors Agreement of Ocean Health.

- On-going research by state and federal agencies, and universities in coastal watersheds, nearshore waters, and off-shore waters. Incorporating key information on wildlife and ecological processes will improve Oregon's biodiversity.

We encourage federal agencies to follow Oregon's lead and establish similar reserve areas in the federal waters off the Oregon coast. We also encourage federal and state agencies and legislatures to prioritize the funding and implement monitoring studies that will help determine the effectiveness of reserves, and whether the objectives are being met.

Should OPAC members need additional information on marine birds, PSG would be pleased to assist with obtaining this information.

Sincerely,

A handwritten signature in black ink that reads "Craig S. Harrison". The signature is written in a cursive style with a long horizontal flourish at the end.

Craig S. Harrison  
Vice-Chair for Conservation