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February 7, 2018

Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

RE: Comments from the Oregon Society of American Foresters on the Status Review of Marbled Murrelet (*Brachyramphus marmoratus*) in Oregon and Evaluation of Criteria to Reclassify the Species from Threatened to Endangered Under the Oregon Endangered Species Act

Dear Commissioners,

In my role as the Chair of the Oregon Society of American Foresters (OSAF), I submit here, comments on the Status Review of the Marbled Murrelet (*Brachyramphus marmoratus*) in Oregon and Evaluation of Criteria to Reclassify the Species from Threatened to Endangered Under the Oregon Endangered Species Act.

For background about my organization and perspective, the OSAF has approximately 850 members and is the largest state affiliate of the national Society of American Foresters (SAF). The SAF supports and represents the forestry profession in advancing the science, education, technology and practice of forestry. OSAF members work throughout the state in a variety of organizations, including local, state, and federal agencies, higher education, as well as the private sector.

Because the marbled murrelet is found predominately in forested lands of western Oregon, many OSAF members are acutely impacted by regulations surrounding marbled murrelet conservation. Thus, they are primary stakeholders in the current decision to reclassify the species from threatened to endangered under the Oregon Endangered Species Act. However, I must emphasize that **OSAF provides an independent, professional perspective** rather than the views of our members, employers, public or private. I write to you today to suggest that the Status Review improperly characterizes the current status of the marbled murrelet in Oregon.

OSAF believes the report should place greater emphasis on current population trends in Oregon.

OSAF believes that a change in the status of the marbled murrelet from threatened to endangered is not warranted for the following reasons:

1. Population numbers in Oregon are stable and trending positive over the last several years. At-sea monitoring efforts suggest populations in zones 3 and 4 (Oregon) are not declining. In fact, zone 4, spanning the S. Oregon and N. California coast, recorded an increase in population from 2001-2015 of 3% annually (unpublished data USFWS).
2. Older forest structure is increasing across ownerships, with even greater returns expected in the near future on thousands of acres across western Oregon. Timber harvest levels on federal and state land has drastically decreased over the past 30 years. Additionally, federal and state agencies have been managing *for* older forest structure since the 1990's, and as a result marbled murrelet habitat is increasing across its range in Oregon. Despite abundant habitat availability, federal and state survey efforts continually find vacancies in swaths of old growth forest, suggesting that forest habitat is not a limiting factor in population abundance.
3. We are at the beginning of the largest single investment in marbled murrelet research in United States history right here in Oregon. After investments from the Oregon legislature for this endeavor, Oregon State University has an opportunity for breakthrough science that will no doubt help fill very large gaps in our current understanding of this species. There is much to learn about this very secretive bird, and we've only just begun to climb that mountain. Early results have demonstrated how little we really understand about the marbled murrelet.

Thank you again for the opportunity to provide comments. OSAF members support robust research and have long invested in conservation efforts for threatened and endangered species. At this time, OSAF believes there is a lack of available data to support uplisting the marbled murrelet.

Sincerely,



Fran Cafferata Coe,  
Oregon Society of American Foresters 2018 Chair