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Sunshine Coast
Conservation
Association

Recovery Planning
Environment Canada
15th Floor, Place Vincent Massey
351 St. Joseph Blvd.
Gatineau, QC
K1A 0H3

P.O Box 1969
Sechlet, B.C
Canada
V0N 3A5

Email: office@thescca.ca
www.thescca.ca

**Re: (Proposed) Recovery Strategy for the Marbled Murrelet
(*Brachyramphus marmoratus*) in Canada**

Please accept this letter as part of the record of public comments for the (proposed) Recovery Strategy for the Marbled Murrelet (*Brachyramphus marmoratus*) in Canada.

The Sunshine Coast Conservation Association (SCCA) has worked since 1996 to protect the biodiversity and integrity of the air, water, forests and marine environments of British Columbia's Sunshine Coast Forest District. Our registered charitable organization represents approximately 225 members and 30 local citizens' groups.

The SCCA has been acutely aware of the decline of Marbled Murrelet (MAMU) populations in the Sunshine Coast Forest District, which covers approximately 2,000,000 hectares, since our association's inception nearly twenty years ago. For example, in 2001, we successfully initiated a judicial review which established that significant errors in law were made during the process by which logging approvals were awarded in documented Marbled Murrelet nesting habitat in the Brittain River Landscape Unit.

We are pleased that the long awaited (since June 2007) proposed Strategy has finally been posted on the Public Registry. Nevertheless, the SCCA has three areas of concern: the short-term population and distribution goals for the recovery of the species, the failure to set habitat protection as an urgent priority and the management of marine habitat to be delayed to the long term.

The Committee on the Status of Endangered Wildlife in Canada (COSEWIC) assigned the Marbled Murrelet Threatened status in 1990, based in part on the loss of nesting habitat. In 2003, with the enactment of the Species at Risk Act, the benchmarks for the population and proportionate amounts of nesting habitat for MAMU were set in the six Conservation Regions.

The Sunshine Coast Conservation Association is a non profit society. Charity #87322 0446RR0001

Our Mission

To preserve the natural biodiversity of the Sunshine Coast region for the present and future benefit Of humanity and all life

In 2004, specifically concerned about the increasing loss of nesting habitat in the Georgia Depression ecoprovince, the SCCA submitted a citizen's petition to the Chair of COSEWIC requesting a review in the status of that sub-population.

Although not granted the review, we note that last year, in the Minister of Environment's Response Statement issued January 03, 2013, acknowledged COSEWIC's estimate that over 20% habitat loss [for the Canadian population] had occurred for the past three generations (one generation = 10 years) and that population losses exceeding 30% were projected over the next three generations

(http://www.sararegistry.gc.ca/virtual_sara/files/statements/rs_39_538_2012-10_e.pdf).

These calculations only go back to 1990 therefore habitat loss and attendant population decline is even greater as the calculations do not include the very significant proportional losses that occurred previous to the assigned Threatened status in 1990. As of 2014, this species cannot afford to lose any more critical nesting habitat and indeed additional habitat must be recruited to increase the available nesting habitat. The retention objective must be updated and set for 100% retention plus restoration habitat, much higher than the proposed Recovery Strategy's retention target of an average of 70%, and 85% specifically for the Southern Mainland Coast Conservation Region.

As shown in the extensive studies conducted to date understanding populations and the attributes and locations of remaining nesting habitat, the SCCA believes that there is currently enough data to support the actual complete identification and protection of remaining critical nesting habitat and agrees with the statement that: "Currently available information is adequate to spatially identify and map areas of potentially suitable Marbled Murrelet nesting habitat" (p. 21). In the proposed Strategy critical nesting habitat is not spatially identified and mapped; this must be done in the final Strategy for the critical habitat to be meaningful. We recommend that protection of nesting habitat be listed separately as an urgent Strategic Direction for Recovery and not as part of a "General Description of Research and Management Approaches of Habitat Management" (p.17).

In January of this year the SCCA submitted 51 nominations for MAMU Wildlife Habitat Areas (WHAs) located in 14 Landscape Units within the Sunshine Coast Forest District. These nominations to the Ministry of Environment are based on high quality nesting attributes with special regard to low level helicopter reconnaissance data. Many of these nominations were also supported by either known nesting locations and/or long term radar monitoring. The polygons were designed, where possible, to address operational and logging block conflicts, private lands, parks and reserves, First Nation Reserves and other WHAs or Old Growth Management Areas. The polygons were mapped onto a GIS Layer and also presented to the MoE. The SCCA would be pleased to share this information. Selected information will be available on our web site (www.thescca.ca) and the remainder will be available upon request. This effort is an example of how quickly, and economically, areas of critical nesting habitat can be identified and moved forward for urgently required protection. This is only possible if its specific geographic location is identified. Nesting critical habitat for Murrelet under SARA should include *but not be limited to* the habitat we have identified in our WHA nominations.

Our third area of concern is the lack of protection for MAMU marine habitat or identification of any marine critical habitat. Recovery of Marbled Murrelet populations requires both terrestrial and marine habitat protection, the former for nesting and the latter for foraging and moulting.

Human activities threatening MAMU marine habitat were noted as early as 1998, for example, that “oil spills and drowning in gill nets...have caused some deaths” and that “A major oil spill could be catastrophic“, (Wildlife in British Columbia at Risk: Marbled Murrelet, 1998, BC Ministry of Environment, Lands and Parks). More recently, in the January 2013 Response Statement, COSEWIC noted that future threats include proposed shipping routes in the core of the species’ range, fisheries by-catch and changing sea conditions. In spite of this, the proposed Strategy states that there “... is insufficient information at this time to identify and map suitable marine habitat” (p. 21).

The SCCA argues that MAMU recovery will be imperiled by this delay. The most likely threat at the present time will result from an increase in shipping, including oil exports. Data identifying marine habitats could be collected from other sources including planned shipping developments, birding groups and from researchers conducting other MAMU counts (e.g. long term radar monitoring sites). Partial critical habitat could be identified and readily protected even if only for an interim period until new information becomes available. In keeping with the Precautionary Principle, we strongly recommend that this recovery strategy identify known and suspected/potential marine critical habitat to the greatest extent possible, and that protection of marine MAMU habitat be listed immediately as an urgent Strategic Direction for Recovery, and that all marine threats be listed for investigation under the General Description of Research and Management Approaches.

Thank you for your attention to these concerns.

Sincerely,

Jason Herz
Chair, Sunshine Coast Conservation Association

cc

Minister of the Environment for Canada
Minister of the Environment for BC
MFLNRO
MP John Weston
MLA Nicholas Simons