

May 14, 2019

Hannah Anderson  
Listing and Recovery Section Manager, Wildlife Program  
Washington Department of Fish and Wildlife  
600 Capitol Way North, Olympia, Washington 98501-1091

**RE: Tufted Puffin Recovery Plan and Periodic Status Review**

Dear Hannah Anderson,

Thank you for the opportunity to comment on the Draft Washington State Recovery Plan and Periodic Status Review for the Tufted Puffin ([Hanson et al. 2019](#)). Audubon Washington is an organization dedicated to the protection of birds and their habitats. There are 25 active Audubon chapters here in Washington, representing over 35,000 members. Together, we are deeply concerned about current status, trend and recovery prospects for the Tufted Puffin population in our region.

Tufted Puffin recovery presents a tremendous challenge – and opportunity – for our state. Tufted Puffins are iconic birds that enjoy attention in the popular press and evoke strong connections with ocean health. They have great potential to act as a flagship species for marine conservation and climate change mitigation here in Washington, and to connect our conservation efforts with that of other regions in the Pacific Flyway.

Unfortunately, ongoing budget and staff constraints at WDFW, and within the Wildlife Program in particular, has the state attempting to launch a management response when the species is already in crisis. This response, in turn, is constrained by critical uncertainties regarding the relative importance of the factors driving their decline. Nevertheless, striving to recover the species is a cultural and biological imperative, and may yet succeed if we work strategically and use a multi-disciplinary approach. Audubon offers the following recommendations that we hope will enable the Department to move quickly and strategically to enact core elements of a successful recovery strategy.

The Recovery Plan and Status Review (Plan) describes a number of potential factors contributing to Tufted Puffin declines in Washington, including reduced prey availability, climate change effects, and miscellaneous factors such as invasive species, toxics, and predation pressure. The plan also acknowledges a high degree of uncertainty regarding which of these factors might be the most significant drivers of population decline in our state, and the southern portion of their range more generally. We agree that addressing this uncertainty and

ameliorating threats using a strategic research and monitoring approach should be the main goal of the Plan.

While it seems likely that changing ocean conditions associated with climate change are impacting Tufted Puffin prey availability, it is indeed curious that similar precipitous declines are not being observed in our region for closely related species with similar prey requirements, e.g., [Rhinoceros Auklets](#). Pursuing a research and monitoring agenda that provides greater certainty about the particular factors influencing Tufted Puffin breeding success is therefore a critical need. Similarly, the far flung winter range of the species points to the equally critical task of collaborating with partners across the southern range to understand and address limiting factors in their wintering grounds. The research and management information needs for successful recovery of the Tufted Puffin are considerable, and will necessitate a rapid mobilization of staff and partner resources, a highly targeted research and monitoring agenda, strong external partnerships, and substantially greater department support than has been outlaid to date.

The Plan provides a comprehensive list of information needs and associated strategies and tasks needed to better understand factors driving Tufted Puffin declines. However, we are concerned that WDFW and relevant partners' limited resources and capacity to fulfill these tasks will result in the ultimate extirpation of the species in our state and region. Given the Tufted Puffin's precipitous decline, we recommend that WDFW develop an action plan that prioritizes actions that 1) immediately address known threats in our region, 2) test hypotheses related to bolstering reproductive success, and 3) that are designed with specific management or policy decision points in mind. We also recommend that WDFW work with partners across the southern range, as well as across internal program divisions, to pursue a cohesive, targeted research and monitoring strategy that recognizes the cross-jurisdictional nature of the Tufted Puffin annual cycle. We offer the following recommendations for the Department's consideration:

1. **Use an experimental design approach at scale.** Develop and pursue a targeted research and monitoring strategy with partners in the southern portion of the range (e.g., Pacific Seabird Group (PSG) technical committee) to prioritize actions that are likely to have immediate effects on survival and fecundity and that maximize the effectiveness and relevance of data collection efforts across the range. When possible, use a hypothesis driven approach rather than surveillance monitoring (except where surveillance monitoring is occurring via other programs, e.g., Marbled Murrelet boat surveys).

**Example:** Rather than doing a comprehensive assessment of nonnative species impacts (2.2.1), consider implementing non-native species control on species that are already suspect to be problematic using an experimental design that will inform adaptive management. Integrate study sites in British Columbia and Oregon (and elsewhere) when possible.

**Recommendations:**

- Review monitoring and research tasks in the Plan to ensure that they are designed to distinguish between contributing factors.

- Reframe research questions as hypotheses.
- Leverage PSG technical committee to evaluate the suitability of out-of-state locations and partners for inclusion in experimental design.

2. **Strengthen links between tasks and expected outcomes.** The current list of proposed recovery strategies and actions reads as a comprehensive list of all known information, management, policy and outreach needs, but it's not clear how this list adds up to a strategic approach to arresting and reversing puffin declines. Similarly, while the implementation plan provides a priority rating for each of identified tasks, the tasks are written in an open-ended manner, making it difficult to discern how one would measure progress or success. Reframing these tasks to reflect specific hypotheses, policy information needs or proposed changes, and expected outcomes for Tufted Puffin survival and fecundity would provide greater clarity on the strategic approach and outcomes envisioned by the Department. This in turn would generate greater confidence by partners and funders wishing to participate in and support Tufted Puffin recovery.

**Example:** Under Recovery Task 4, "Ensure adequate prey availability for Tufted Puffins in Washington," describe the predicted effects that increasing prey populations would have on Tufted Puffin breeding success and the specific management actions and policies that would be enacted or informed by this information.

**Recommendations:**

- Upon approval of the Tufted Puffin Recovery Plan, pivot to creating a short-term action plan.
  - Reframe or elaborate on the specific hypotheses that need to be tested for research-related tasks.
  - Be specific about policy needs - what are the relevant policies that govern Tufted Puffin prey and habitat management that could be leveraged to support their recovery?
  - Identify management actions or policy modifications that can be pursued with existing knowledge.
  - Create objectives for policy and public outreach tasks.
3. **Leverage External and Internal Assets.** In addition to collaboration with external partners, leverage the data, skills and expertise across various WDFW program divisions, such as Wildlife, Fisheries, Habitat, Outreach and Policy, to put the Department's full weight behind species recovery and ecosystem management.

**Example.** A team that includes expertise from forage fish, groundfish, shoreline permitting, and policy programs could help identify relevant policy targets and the types of information needed to warrant policy modifications.

**Recommendations:**

- Consider using Tufted Puffin recovery as an opportunity to develop an internal (and external) comprehensive conservation and policy strategy for marine ecosystem health.
- Assemble multi-disciplinary team to review and comment on new/potential threats to Tufted Puffins and their food and habitat resources (e.g., proposed terminal at Robert's Bank and associated vessel traffic, proposed naval training exercises).

Finally, we were pleased to see and concur with the emphasis on public engagement and partnerships, e.g. Tasks 7 and 8, as well as a recognition of the policy changes that are needed related to climate change and fisheries management. The Tufted Puffin has the potential to act as a flagship species to galvanize conservation efforts that benefit ocean health and address climate change. We would be pleased to work with the Department to spread the word about Tufted Puffins to the public and to participate in multi-disciplinary efforts to improve marine ecosystem conditions in our region.

Please don't hesitate to reach out with any questions.

Sincerely,



Trina Bayard, Ph.D.  
Director of Bird Conservation