



*"Promoting Birding and Conservation as Community Educators,
Volunteers, and Stewards"*

P.O. Box 502 Sequim, WA 98382

March 8, 2017

SEPA Center
PO Box 47015
Olympia, WA 98504-7015
(Sent electronically sepacenter@dnr.wa.gov)

RE: The Long-Term Conservation Strategy for the Marbled Murrelet Draft Environmental Impact Statement (SEPA File No. 12-042001)

Dear SEPA Center,

Thank you for the opportunity to comment on the draft Environmental Impact Statement (dEIS) of the Long-Term Conservation Strategy (LTCS) and amendment to the 1997 Washington State Habitat Conservation Plan for the Marbled Murrelet. The Olympic Peninsula Audubon Society (OPAS) promotes birding, conservation of habitat and biological diversity on the Olympic Peninsula through education and conservation. We are the Clallam County chapter of the National Audubon Society.

We request that DNR accept and analyze the "Conservation Alternative" in a Supplemental EIS before selecting a preferred alternative and that the Board of Natural Resources adopt the Conservation Alternative as the Marbled Murrelet LTCS. The Conservation Alternative, as described by Dr. Kara Whittaker and Dr. David Lank in their comment letter from the Washington Forest Law Center, is a modification of Alternative F. Their comments add further protections to nesting habitats to attain three biological goals 1) A stable or increasing population for at least a 10-year period 2) An increasing geographic distribution and 3) A population that is resilient to disturbances.

We are deeply concerned about the 30% decrease in Marbled Murrelet nesting habitat on State lands from 1993 to 2012, mostly due to timber harvest (Raphael et al In Press). DNR manages about 15% of current Murrelet habitat with the potential to double habitat as unharvested trees mature to a size where they can provide nesting platforms.

DNR managed lands are geographically and ecologically crucial to the survival of the Marbled Murrelet by their proximity to marine areas that provides a shorter and less risky commute for Murrelets between nesting and marine foraging areas. State lands are more productive than other higher elevation forests further inland and develop more rapidly into murrelet habitat. Most importantly, scientists emphasize that protecting existing habitat in the near-term is essential to Murrelet survival until degraded habitat on federal lands recovers in the years ahead.

DNR is obligated to recognize and act on the WDFW's December 2016 uplisting of the Marbled Murrelet from a state threatened species to a state endangered species. The six existing dEIS Alternatives do not fully reflect the bird's imperiled status, as documented by the ongoing population decline in the dEIS population viability model risk analysis (Peery & Jones 2016), and by the 44% smaller population size (from 2001-2015; Lance and Pearson 2016).

In DNR's objective #2 concerning Marbled Murrelet habitat, the objective states:

"Provide forest conditions in strategic locations on forested trust lands that minimize and mitigate incidental take of Marbled Murrelets resulting from DNR's forest management activities. In accomplishing this objective, we expect to make a significant contribution to maintain and protect Marbled Murrelet populations." – The six current alternatives analyzed in the dEIS for the LTCS show a declining population trend for the next 50 years and will not attain the objective to maintain and protect Marbled Murrelet populations.

DNR's own population modeling shows none of the current alternatives significantly contributes to Marbled Murrelet survival and recovery, nor do they meet the criteria for allowing take under the Endangered Species Act.

Alternative F, based on the 2008 Science Report, comes closest to reaching Murrelet recovery goals, but this alternative does not include important, more recent scientific findings. For example, a 2015 study identified the regional significance of the Strait of Juan de Fuca as a "hotspot" of exceptionally high Murrelet density and nesting habitat (Raphael et al. 2015). Studies also show that compared with marine variables, nesting habitat attributes explained more of the variation in Murrelet abundance, underscoring its greater importance to murrelet recovery. Additionally, the 25,000-acre harvest of mature habitat (including 3,023 acres of high quality habitat) allowed in Alternative F shows continual population decline every decade and does not allow a sustainable population recovery for the Marbled Murrelet.

Previously unrecognized as important Murrelet nesting habitat, the DNR managed lands along the Strait of Juan de Fuca are of vital importance to OPAS members that live in Clallam County and care about this endangered species. Science and research point to Murrelet extirpation from Washington State within the next 50 years should the science-based provisions found in the Conservation Alternative be ignored. We contend Marbled Murrelet extirpation is an unacceptable alternative.

Furthermore, we believe that the dEIS is deficient by not addressing climate change. Future habitat losses associated with our changing climate may be substantial and must be accounted and mitigated for in the LTCS.

OPAS supports these additional recommendations within the Conservation Alternative:

- Add Emphasis Areas and Special Habitat Areas from Alternative E, collectively called "Conservation Areas" when combined with Marbled Murrelet Management Areas (MMMA's). This will increase the overall amount of both conserved habitat acres and interior forest.
- Provide at minimum, 150-meter buffers on occupied sites to prevent edge effects such as 1) predation on Murrelet nests by avian predators, 2) microclimates unfavorable to the growth of moss and epiphytes needed for nest scrapes, and 3) damage from windthrow.

- To restore high quality nesting habitat, allow variable density thinning from below, outside of occupied site buffers.
- We support recommendations in the Conservation Alternative prohibiting disturbances to Marbled Murrelets and their nests during the nesting season.

In Conclusion:

OPAS recognizes that as manager of state trust lands, DNR has legal fiduciary responsibilities under the State Constitution to generate revenue and other benefits for each trust. We support full funding for the State's Encumbered Forests Program and the State Trust Lands Transfer Program. In addition, we recommend that DNR and the State seriously consider other funding sources for trust beneficiaries. Currently, there are insufficient resources to adequately support the trust beneficiaries and protect threatened and endangered species. We support the formation of a Governor's and Commissioner of Public Lands' Joint Task Force for trust reform and rural economic development.

Marbled Murrelets are an indicator species that signify the health of our coastal old-growth forests and watersheds, places vital for Washington's people and communities. We urge you to analyze and adopt a new Conservation Alternative that fully protects and restores Marbled Murrelet habitat and provides the best opportunity for their recovery in Washington.

Sincerely,



Ken Wiersema,
President