



*"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: Comments on Sustainable Harvest Calculation (SEPA File No. 15-012901)

Dear SEPA Center,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) of the Sustainable Harvest Calculation (SHC). 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 are concerned that you cannot meet your first objective: "Coordinate with the Marbled Murrelet long-term conservation strategy environmental analysis so that the Board of Natural Resources can integrate the effects of the range of Marbled Murrelet conservation alternatives on the sustainable harvest level and arrearage." It is obvious that you cannot accomplish this in forested habitat used by the Marbled Murrelet, until you first establish the Long Term Conservation Strategy (LTCS) for the bird. DNR must postpone and coordinate the selection of a preferred Sustainable Harvest Calculation until after the US Fish and Wildlife Service (USFWS) has approved a preferred conservation strategy for the Marbled Murrelet.

The existing six alternatives in the proposed LTCS for the Marbled Murrelet fail to meet DNR's first SHC objective "to maintain and protect Marbled Murrelet populations"; further, we recommend analysis of the proposed "Conservation Alternative" for the Marbled Murrelet. This alternative will be submitted to the BNR by Dr. Kara Whittaker and Dr. David Lank in their comment letter from the Washington Forest Law Center and should become a 7th LTCS alternative.

Please recall that in 1999, the Forest Practices Board amended the rules to be consistent with the April 1999 Forests and Fish Report. The objectives of that report are to protect public resources, focusing on water quality, salmon habitat, federally listed species, and other aquatic and riparian resources. The legislature also directed that the governor seek assurances from federal agencies so that compliance with the forest practices rules would satisfy federal requirements under the Endangered Species Act (ESA). DNR must analyze and accept an alternative in the LTCS of the Marbled Murrelet that will satisfy the federal requirements for the ESA. The six currently proposed alternatives in the LTCS do not meet ESA requirements.

We commend you for considering climate change as part of the affected environment. We believe it is a critical component of any environmental impact statement, especially on forest health and its wildlife inhabitants. State forest land can play a significant role in mitigating greenhouse gas emissions and setting aside state forest land for carbon sequestration could provide additional revenue for trust beneficiaries.

We understand DNR's legal obligation, as set forth in the State's constitution, to provide revenue to the trust beneficiaries; however, DNR also has a responsibility to manage State lands for wildlife and other environmental benefits. We support the formation of a Governor's and Commissioner of Public Lands' Joint Task Force for trust reform and rural economic development to establish alternative sources of revenue to fulfill DNR's revenue producing obligations.

In summary, OPAS believes that until the USFW Service approves a conservation strategy for the Marbled Murrelet, it will be impossible to determine the environmental impacts of the Sustainable Harvest Calculation on DNR managed forests that are Marbled Murrelet habitat.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Wiersema", with a stylized flourish at the end.

Ken Wiersema
President