



"Volunteers, educators and stewards for birds and habitat conservation"

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SEPA Center
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Sent electronically <https://www.surveymonkey.com/r/MMLTCSRDEIS>

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

Dear SEPA Center,

On March 8, 2017, the Olympic Peninsula Audubon Society (OPAS) commented 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.

In our previous comments, OPAS requested that DNR accept and analyze the "Conservation Alternative" described by Dr. Kara Whittaker and Dr. David Lank in their comment letter from the Washington Forest Law Center (WFLC). We supported the best available science used by the WFLC after they determined that a modification of Alternative F would add further protections for Marbled Murrelet nesting habitats. Their comments included three important biological goals.

We continue to believe it is imperative that DNR attain these three important biological goals for the Marbled Murrelet:

1. Stabilize or increase population for at least a 10-year period.
2. Increase the geographic distribution.
3. Support a population that is resilient to disturbances.

Based on the importance of attaining the three important biological goals, we have carefully examined the Revised Draft Environmental Impact Statement (RDEIS) for the Marbled Murrelet, the current eight alternatives under consideration, and especially DNR's preferred alternative H. Though we welcome the opportunity to comment, it is our concern that most alternatives provided, including Alternative H, do not support sustainability or continued growth of the Marbled Murrelet population within state-managed lands and will therefore result in smaller populations after 50 years. This places the Marbled Murrelet, already on the Washington State Endangered Species list, in grave danger over the next few decades and hinders its chances to stabilize and increase populations over the next 50 years.

OPAS is the Clallam County chapter of the National Audubon Society with current membership of over three hundred and fifty. Our members remain deeply concerned about the continued decrease in

Murrelet populations (44% in Washington State since 2001) and the loss of Marbled Murrelet nesting habitat on state lands mostly due to timber harvest (Raphael et. al).

The Olympic Peninsula Audubon Society's Conservation Committee and its members have been following the plight of the Marbled Murrelet for over a decade. It is because of our interest in the continued survival of the Marbled Murrelet that we offer the following:

- We believe a meaningful conservation plan should and must meet the long-stated biological goals for the species – to stabilize or increase population over time, to expand its geographic range and to increase resilience of the Marbled Murrelet to natural and human-caused disturbances. Alternative H fails to accomplish this goal.
- DNR's preferred Alternative H permits the harvest of too much mature and old forests over the next 50 years. This does little to conserve enough habitat as mitigation and causes Alternative H to fall short in this area.
- In the North Puget region, preferred Alternative H anticipates a net loss of over 1000 acres after 50 years. This appears to be counterproductive in a long-range plan that should be looking forward, not backward, and hinders the capacity of Murrelets to stabilize or increase in population size and to expand its geographic base.
- The Straits region is another example of the potential for increased habitat loss. Compared to Alternatives F and G, Alternative H protects less habitat, reduces the amount of forest cover around occupied and buffered sites and misses the opportunity to broaden the geographic distribution of Murrelets in western Washington, once more inhibiting growth of future habitat over the next 50 years.
- In the North Puget Region, four areas that are protected within the Marbled Murrelet Management Areas in Alternative F are not protected in Alternative H. Once again, the Long Term Conservation Strategy misses the opportunity to protect occupied habitat in a way that also improves forest conditions that aid in habitat growth.
- In the Southwest Washington region, there are significant differences in the size of the conservation areas. Although Alternative H appears to protect as much current and future habitat as Alternative F and G, the size of the conservation areas in Alternative H are smaller than either F or G.
- We believe the plan is too narrow in its scope. It does not take into account other causes that impede growth, habitat loss and degradation, such as natural disasters, wildfires, wind throw, and climate change.
- The LTCS should evaluate and include human-caused disturbance, especially in occupied sites, forest buffers around the sites, and "special habitat areas". Disturbances such as road construction and the use of heavy equipment may result in "take" of Murrelets that is not properly mitigated. The LTCS cannot merely reduce the impacts of human disturbances – it must

fully minimize and mitigate for disturbance take across all conservation areas and for the entire 50-year lifespan of the Habitat Conservation Plan.

- In the time that it has taken the DNR to adopt a Long Term Strategy, the population in Washington has declined at the rate of 3.9% per year due mostly to loss of habitat. The range of alternatives do not properly reflect the imperiled state of the Marbled Murrelet. Washington DNR needs to act *now* to compensate for these past losses and prevent functional extirpation from the state in the near term.
- An Adaptive Management program is essential to the success of the Long-Term Conservation Strategy. The Habitat Conservation Plan should include explicitly stated measurable biological goals and objectives, provisions for plan reviews, research to test assumptions and the effectiveness of management actions, and corrective actions as needed to meet mitigation targets. Therefore, ongoing monitoring of the Marbled Murrelet population is mandatory.

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 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 acknowledge that many rural communities are affected by State management plans, but we believe that Marbled Murrelet protections and healthy rural communities can coexist. We support DNR's efforts on the Solutions Table to find ways to create more economic opportunities and new ways to fund county services other than logging remaining Murrelet habitat.

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 an alternative that fully protects and restores Marbled Murrelet habitat and provides the best opportunity for their recovery in Washington.

Sincerely,



Robert Phreaner
President