



Pacific Seabird Group

22 February 2017

Washington Department of Natural Resources
SEPA Center
PO Box 47015
Olympia, WA 98504-7015
sepacenter@dnr.wa.gov

RE: Comments on the Draft Environmental Impact Statement for the Long-Term Conservation Strategy for the Marbled Murrelet, SEPA File No. 12-042001

On behalf of the Pacific Seabird Group (PSG), we are providing comments on the draft Environmental Impact Statement for the Long-term Conservation Strategy for the Marbled Murrelet (*Brachyramphus marmoratus*). We urge the Washington State Department of Natural Resources (DNR) to adopt a more conservative alternative-- Alternative F with modifications--that includes additional conservation measures to restore severely declining populations in Washington State, especially given the species' status: federally listed as Threatened and state listed as Endangered.

PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, and the USA. Among PSG's members are biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. For two decades, PSG has taken an active lead in resolving many scientific aspects of the biology and conservation of Marbled Murrelets. PSG has served as an unbiased

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forum for government, university, and private sector biologists to discuss and resolve such issues.

Of all the alternatives presented in the draft environmental impact statement, Alternative F will result in:

1. the highest population by the end of the planning period (page 4-48);
2. the earliest reversal of population decline and greatest population increase (pages 4-49);
3. a projected net habitat increase after the first decade, the most long-term gain in interior habitat, the highest modeled population gains, and the lowest risk of quasi-extinction (page 4-51);
4. the most overall future habitat development in important areas (southwest Washington, south coast, Columbia, North Puget; page 4-58); and
5. an emphasis on murrelet conservation in important areas west of national forest lands in North Puget Sound, which are in closer proximity to marine waters.

However, there are additional measures that are required to ensure murrelet survival and recovery in Washington State including:

1. preventing harvest of any occupied, suitable, and near suitable habitat in the next 50 years;
2. providing larger buffers (150m+) around all occupied, suitable, and older-forest habitat; and
3. ensuring buffers around all the Special Habitat and Emphasis areas from Alternative E in Alternative F.

These additional provisions are needed to provide murrelets with more habitat, more interior forest, more protection from predators, and the best opportunity to protect habitat from poor microclimate and windthrow. Since the murrelet population is declining precipitously now (4.4% per year), the only way to prevent further decline is to increase habitat and protections – not decrease them. The best available science recommends maintaining all occupied and suitable habitat, and increasing the amount of habitat, especially in gap areas like southwest Washington, over the long term (McShane et al. 2004, Lynch et al. 2009, USFWS 2012, Falxa and Raphael 2016).

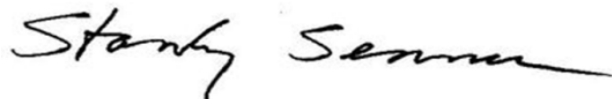
Washington DNR lands are located primarily in a matrix of fragmented private lands. The remaining older-aged forests must be protected to maintain murrelet populations in the short term. In addition, new habitat must be created to help increase populations in the long term. Only Alternative F – with the above modifications – will provide murrelets with enough habitat to ensure their survival and recovery. PSG urges you to

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provide the greatest protections for this species by adopting Alternative F and our recommended modifications.

Thank you for this opportunity to comment. PSG would be pleased to work with DNR and lend the expertise of its members to protect and restore populations of the Marbled Murrelet in Washington State.

Sincerely,

A handwritten signature in black ink that reads "Stanley Senner". The signature is written in a cursive, flowing style.

Stanley Senner
Vice-Chair for Conservation
111 SW Columbia St – Suite 200
Portland, OR 97201

Literature Cited

Falxa, G.A. and M.G. Raphael, tech. coordinators. 2016. Northwest Forest Plan-The first 20 years (1994-2013): Status and trend of Marbled Murrelet populations and nesting habitat. U.S. Department of Agriculture, Forest Service, General Technical Report PNW-GTR- 933, Portland, OR. 132pp.

Lynch, D., L. Roberts, G. Falxa, R. Brown, B. Tuerler, and J. D'Elia. 2009. Evaluation report for the 5-year status review of the Marbled Murrelet in Washington, Oregon, and California. Unpublished report. Lacey, WA: U.S. Fish and Wildlife Service, Region 1.

McShane, C., T. Hamer, H.R. Carter, G. Swartzman, V. Friesen, D. Ainley, R. Tressler, S.K. Nelson, A. Burger, L. Spear, T. Mohagen, R. Martin, L. Henkel, K. Prindle, C. Strong, and J. Keany. 2004. Evaluation report for the 5-year status review of the Marbled Murrelet in Washington, Oregon, and California. Unpublished report. Seattle, WA: EDAW Inc. (prepared for the U.S. Fish and Wildlife Service).

U.S. Fish and Wildlife Service (USFWS). 2012. Report on Marbled Murrelet Recovery Implementation Team Meeting and Stakeholder Workshop, Recovery Implementation Team, Lacey, WA: Washington Field Office:
<http://www.fws.gov/wafwo/pdf/FinalReporMarbledMurrelerRITandStakeholderWorksho p.pdf>