



Pacific Seabird Group

Dedicated to the Study and Conservation of Pacific Seabirds and their Environment

Washington Department of Natural Resources
SEPA Center, PO Box 47015
Olympia, WA 98504

June 2, 2017

RE: Amended 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 amending our 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.

The Pacific Seabird Group urges the Board not to accept the DNR's proposed process and timeline. Instead we ask you to fully review and consider all alternatives and implement a Conservation focus that acknowledges Marbled Murrelet habitat takes 200+ years to grow. Taking the appropriate course of action and time to consider alternative conservation strategies is a critical investment in their future.

We feel that the alternatives of the DEIS are biologically inadequate to support the species, or the WA population. Four different agencies independently concluded that none of the DEIS alternatives were adequate and proposed very similar measures to overcome the inadequacies. If you choose an alternative in July without considering the new, proposed alternatives that are different from the DEIS, it would be difficult to change later. Please consider what is best for the species and in so doing, thoroughly review all the proposed alternatives, even if it takes longer than July.

Thank you for your consideration.

Mark Rauzon
Vice Chair for Conservation
Pacific Seabird Group