



November 5, 2018

To: Washington Department of Natural Resources and U.S. Fish and Wildlife Service

The Pacific Seabird Group (PSG) is writing to comment on the Revised Draft Environmental Impact Statement and Habitat Conservation Plan Amendment for the Marbled Murrelet Long-Term Conservation Strategy.

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. 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. Since 1986 PSG has included a Marbled Murrelet Technical Committee, which is composed of several working groups that act on the status, distribution, and monitoring protocol for the Marbled Murrelet. PSG also identifies and facilitates research, addresses conservation problems related to this species, and acts as a liaison between research and government. PSG has served as an unbiased forum for government, university, and private sector biologists to discuss and resolve issues related to Marbled Murrelet conservation along the Pacific coast of North America.

We support a meaningful conservation plan and HCP amendment that must help meet the long-stated and critical goals for the state-endangered Marbled Murrelets including survival and recovery of its population, and to expand its geographic range. Murrelet populations are declining at a rate of 4% per year in Washington (Pearson et al. 2018), emphasizing the need to provide a plan that provides security to murrelets and their habitat in both the short- and long-term.

Accordingly, PSG believes DNR's preferred alternative (Alternative H) does not do enough to support murrelet recovery because it permits the harvest of significant amounts of mature and old forests over the next 50 years, a timeframe that will prove essential to the recovery or extirpation of this species as an iconic forest bird of Washington (I recall they were common off the Seattle waterfront, seeing them foraging in the backwash of ferries in the mid-seventies).

Alternative H anticipates a net loss of over 1,000 acres after 50 years. With the onset of climate change, more forested areas may be lost to drought and fire, so a Long-Term Conservation Strategy should include fail-safe points, where the habitat loss can be stopped if population numbers fall below a designated threshold.

The PSG promotes sound science as the means for decision-making and has developed monitoring protocols to insure all land managers are informed of Best Practices. We advocate that the most recent data available be used by DNR to protect all occupied sites, increase existing interior forest habitat, and establish buffers that will protect vulnerable murrelet chicks from predators.

The Long-Term Conservation Strategy should include No-Net Loss of Habitat and should include more and larger murrelet-specific conservation areas to broaden the geographic distribution of murrelets in western Washington. Isolated conservation areas create gaps in murrelet population that hinder the species' survival and recovery. Broader geographic distribution helps reduce the risk that major human or natural disturbances (logging, road-building, wildfire, increased nest predation) will wipe out significant portions of the murrelet population. In our warming climate, habitat loss and degradation from such disturbances should be accurately calculated and properly mitigated. The Long-Term Conservation Strategy must truly support real conservation for the murrelets for the *long-term*.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, reading "Mark J. Rauzon". The signature is fluid and cursive, with the first name "Mark" and last name "Rauzon" clearly legible.

Mark J. Rauzon  
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Literature Cited:

Pearson, S.F., B. McIver, D. Lynch, N. Johnson, J. Baldwin, M.M. Lance, M.G. Raphael, C. Strong, and R. Young, T. Lorenz, and S.K. Nelson. 2018. Marbled murrelet effectiveness monitoring, Northwest Forest Plan: 2017 summary report. 19 pp.