



Bringing back the birds

March 9, 2017

Lily Smith
SEPA Responsible Official
Washington Department of Natural Resources
SEPA Center
PO BOX 47001
Olympia, WA 98504-7015

Dear Ms. Smith,

On behalf of American Bird Conservancy, Thank you for this opportunity to comment on the draft Environmental Impact Statement and amendment to the 1997 Washington State Habitat Conservation Plan and Long-Term Conservation Strategy for the Marbled Murrelet. I urge the Washington State Department of Natural Resources to analyze and adopt a conservation alternative that modifies Alternative F (Alt F) to include additional conservation measures necessary because of the murrelet's severe population decline and recent uplisting to Endangered status in Washington State.

American Bird Conservancy (ABC) is deeply concerned about the declining conservation status of the Marbled Murrelet which is listed under the federal Endangered Species Act as Threatened, and by Washington State as Endangered. Washington State lands are vitally important for providing future murrelet habitat, particularly in areas dominated by private timber lands managed on 40-50 year rotations that are not expected to become murrelet habitat (page 5-8). [ABC submitted comments](#) in support of the Washington State uplisting and would like to request that this input also be considered as part of our comment for this rulemaking. It is attached for your convenience.

The draft EIS's proposed alternatives E and F identify needed habitat conservation protection areas for the murrelet, and I urge that these areas be protected, and that additional steps be taken to conserve the Marbled Murrelet. Unfortunately, none of the existing alternatives provide an adequate level of protection indicating further analysis may be necessary to adopt the following needed conservation measures:

1. Allow for no harvest of existing and future Marbled Murrelet habitat within the next 50 years. Alt. F allows harvest in the first decade of 25,440 acres of existing murrelet habitat, including 3,023 acres of high quality habitat, but best science as reflected by the [Northwest Forest Plan's 20-Year Monitoring Report](#) recommends that all suitable nesting habitat be retained.

2. Add all Emphasis Areas and Special Habitat Areas from Alt. E to Alt. F to be managed as Marbled Murrelet Management Areas. This will increase the overall amount of both conserved habitat acres, and interior forest.
3. Provide for 150 meter Buffers around all occupied sites and old forest as mapped by the 2008 science team. Buffers less than that are too narrow to protect murrelet nests from predators, suboptimal microclimate, and/or windthrow.
4. Salvage and recovery following natural disturbance events and windthrow should be prohibited in MMMA's and Special Habitat Areas.
5. Blasting within .5 miles of occupied sites, MMMA's, and Special Habitat Areas should be prohibited during the nesting season.

Given its current rapid 4.4 percent annual population decline in Washington State, only Alt F provides a reasonable level of protection for the Marbled Murrelet. Table 4.6.5 indicates that only Alt F is likely to show an increase in population after 50 years; all of the other alternatives show a decline. And if Alt F is modified to forgo the large amount of habitat loss and population loss anticipated in the first decade, the murrelet's projected population would be that much higher, perhaps as high as 684 females by 2050 based on a similar rate of increase.

The EIS states on page 4-49 that Alt F will result in the earliest reversal of population decline and greatest population increase. It further states on page 4-51 that Alt F results in a projected net habitat increase after the first decade, the most gain over time in interior habitat, the highest modeled population gains, and the lowest risk of quasi-extinction. Alt F also provides the most overall future habitat development in important areas (page 4-58).

Given that the murrelet was just uplisted to endangered status in Washington State, the strongest conservation measures possible need to be adopted for Washington State Lands. A modified Alt F, with the proposed changes listed above will provide the murrelet the best opportunity for recovery on Washington State lands, and I urge that it be analyzed and adopted.

Thank you for this opportunity to comment. ABC looks forward to working with the WDNR to conserve the Marbled Murrelet.

Sincerely,



Steve Holmer
Vice President of Policy
American Bird Conservancy