



Summary of Public Comment

Marbled Murrelet Long-Term Conservation Strategy and Sustainable Harvest Calculation

Draft Environmental Impact Statements

presented by:

Kristen Ohlson-Kiehn
Department of Natural Resources

Draft EIS | Public comment

- DEISs were released in December
- 4 Public Meetings were held
SEDRO-WOOLLEY CATHLAMET
PORT ANGELES SEATTLE
- 90-day public comment period ended 3/9/2017

Marbled Murrelet

Long-Term Conservation Strategy

> 5,200 comments received



Who Commented

- **Beneficiaries:** Counties, school districts, cities, ports, PUDs and related associations (20)
- **Environmental and recreation organizations:** Coalition and individual groups (30)
- **Industry and industry organizations** (15)
- **State and federal agencies** (WDFW, U.S. EPA)
- **Individuals** (over 5,000; > 4,000 form letters, postcards)



Who Commented

WA State Association of Counties

Wahkiakum County

Skagit County

Clallam County

Skamania County

City of Forks

City of Sultan

Port of Port Angeles

Washington State School Directors
Association

Several school districts

Chambers of commerce

Snohomish County PUD

The Mountaineers

Seattle Audubon and many local
Audubon chapters

Washington Environmental Council

Sierra Club

Washington Forest Law Center

Defenders of Wildlife

Olympic Forest Coalition

Conservation Northwest

Pacific Seabird Group

American Bird Conservancy

Center for Biological Diversity

Conservation Congress

The Lands Council

Earth Ministry

National Parks Conservation Assoc

WildEarth Guardians

EarthShare

Skagit Land Trust

Baker-Bellingham Rec Committee

American Forest Resource Council

NOTAC

Northwest Watershed Institute

Sierra Pacific Industries

Interfor

Murphy

Hampton Tree Farms

Washington Contract Loggers Assoc

Washington Hardwoods Commission

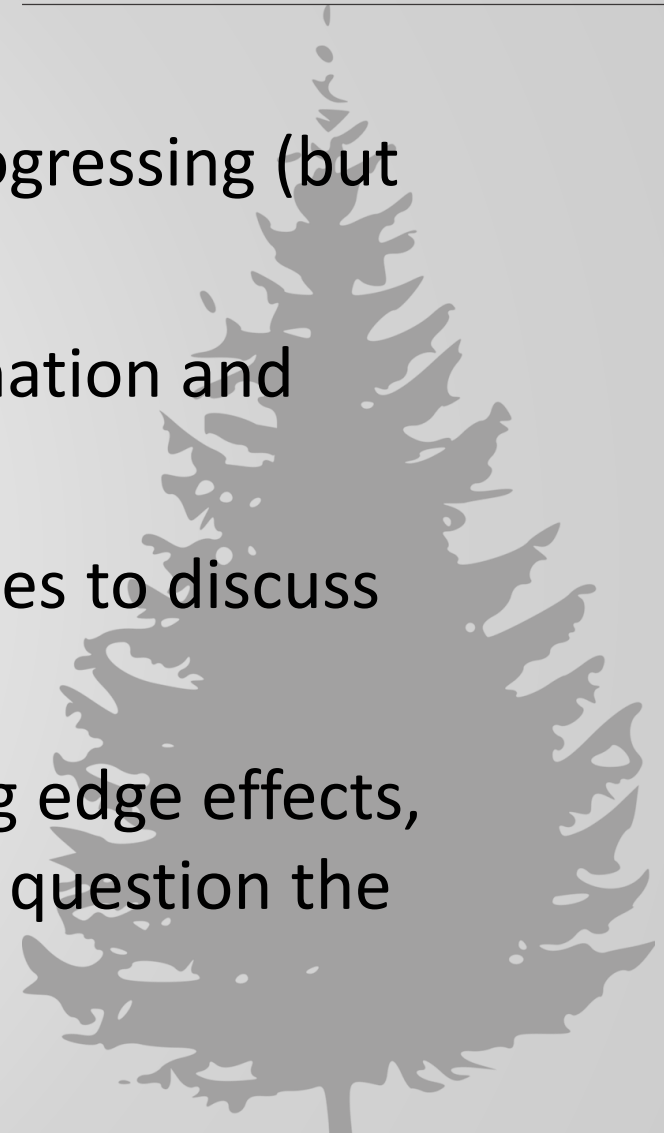
WDFW

US EPA



A few compliments (but...)

- Appreciation that work on a long-term strategy is progressing (but more work to be done)
- Several commenters appreciated the depth of information and analysis provided (but request more analysis)
- Appreciation for the public meetings and opportunities to discuss with staff (but a few wanted a public hearing)
- Some commenters appreciated the focus on reducing edge effects, fragmentation, and consolidating habitat (but others question the science)

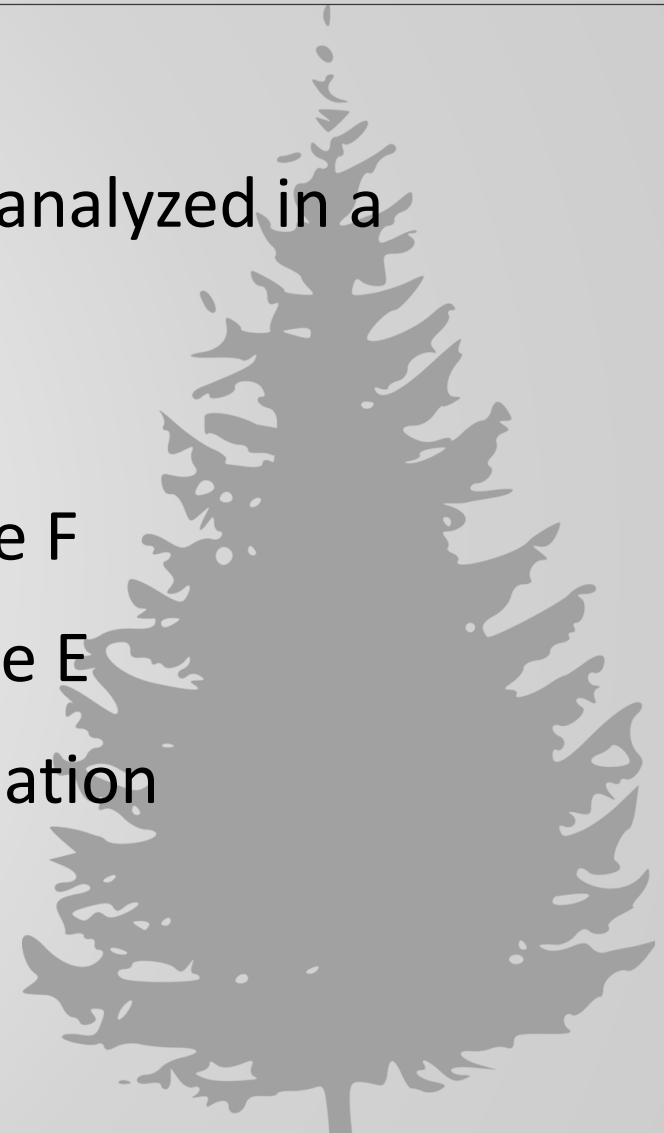


Refresher: The Alternatives

	Alt. A (no action)	Alt. B	Alt. C	Alt. D	Alt. E	Alt. F
Acres of existing conservation	583,000	583,000	583,000	583,000	583,000	583,000
Acres of additional, marbled murrelet-specific conservation	37,000	10,000	53,000	51,000	57,000	151,000
Total approximate acres	620,000	593,000	636,000	634,000	640,000	734,000

Major Themes

- Support for a new “Conservation Alternative” to be analyzed in a revised or supplemental DEIS
- Support for Alternative B
- Support for Alternative F, or an enhanced Alternative F
- Support for Alternative E, or an enhanced Alternative E
- Concern with impacts to murrelet habitat and population
- Concern with economic impacts

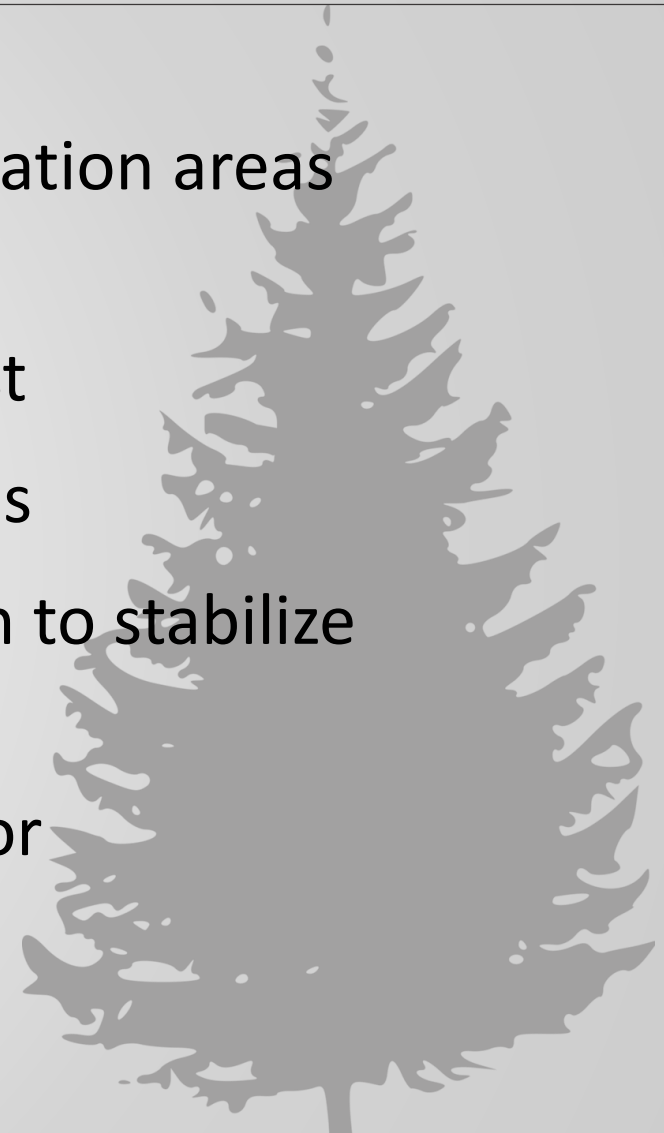


Common Issues

- Range of alternatives not reasonable, doesn't satisfy Need and Purpose
- Fundamental relationship between harvest and trusts is flawed
- Add more analysis: uplisting of murrelet, Navy operations, climate change
- State already does enough under existing HCP to mitigate incidental take- no additional set asides needed
- Conservation areas are inadequate: Need larger buffers, more conservation near Strait of Juan de Fuca
- Need flexibility for recreation uses in conservation areas

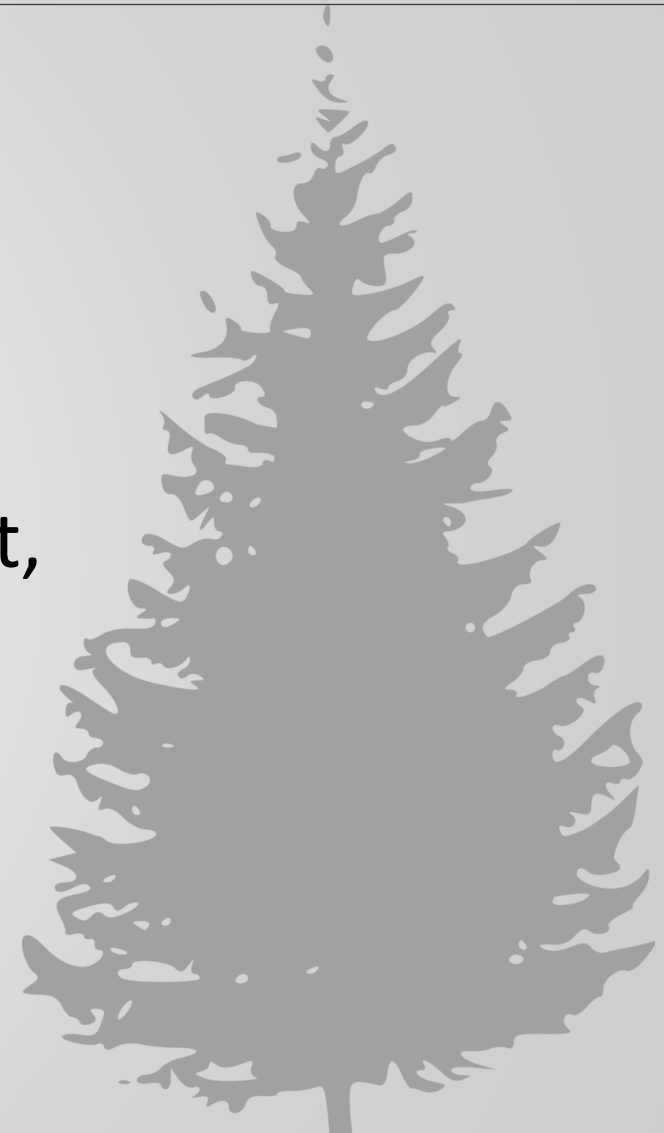
Conservation Alternative

- Larger buffers, more habitat, and additional conservation areas proposed: 876,392 acres total
- Need to better protect mature and old-growth forest
- Too much take/harvest of habitat in DEIS alternatives
- DEIS alternatives don't provide enough conservation to stabilize the population
- New alternative should be fully analyzed in revised or Supplemental DEIS before choosing preferred



E & F +

- Alternative E should be enhanced with additional habitat and conservation areas
- Alternative F should be enhanced with larger buffers, conserve all current and future habitat, add more limits to some forest management activities in and near habitat



Alternative B

- Alternative B is only one that meets trust mandate
- Existing conservation/deferrals adequate
- Adverse impacts to counties must be avoided or fully mitigated
- Other alternatives have too many impacts on industry and jobs, especially rural communities (esp. SWWA)
- More detailed financial analysis is needed



Sustainable Harvest Calculation



Who Commented

- **Beneficiaries:** Counties, school districts, cities, PUDs and related associations (20)
- **Environmental Organizations:** Coalition and individual groups (10)
- **Industry and industry organizations** (15)
- **Individuals** (over 1300; > 1,200 form letters)



Who Commented

American Forest Resources Council

Clallam County Commissioners

Burlington-Edison Public Schools

BUSE Timber

City of Forks

Clallam County Fire Protection Dist 4

Conservation Northwest

Defenders of Wildlife

Forks Chamber of Commerce

Forks Outfitters

Great Western Lumber

Hampton Tree Farms, LLC

Interfor

Lewis County Commissioners

LG Isaacson Co

Mendoza Environmental, LLC

Mount Baker School District

Murphy Company

NOTAC

Northwest Hardwoods

Olympic Forest Coalition

Olympic Peninsula Audubon Society

Port Angeles Regional Chamber of
Commerce

Port of Port Angeles

Quillayute Valley School District

Seattle Audubon

Sedro-Woolley School District

Sierra Club

Sierra Pacific Industries

Skagit County Board of Commissioners

Skamania County Board of
Commissioners

Sno-Isle Libraries

Stevens County

Timberland Regional Library

Washington Contract Loggers
Association, Inc.

Washington Environmental Council

Washington Forest Law Center

Washington Hardwoods Commission

Washington State Association of
Counties

Refresher: The Alternatives

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Murrelet	A	B	D	E	F
Arrearage	Rolled in	702 MMBF / 5 years	462 MMBF / 10 years	462 MMBF / 1 year	Rolled in
Riparian	Up to 10% of riparian area	Up to 10% of riparian area	Up to 1% of upland harvest area	Up to 1% of upland harvest area	Up to 1% of upland harvest area

Major Themes

- Complete the MM LTCS before setting the sustainable harvest level
- Diversify revenue: generate revenue from alternative sustainable sources
- Add to range of alternatives
- Adhere to the trust mandate
- Accuracy of the inventory
- Assess and consider economic impacts
- Arrearage– Support for 702 MMBF and for “rolled in”
- Support for Alternatives 1 and 2



Complete the MM LTCS first

- A sustainable harvest level cannot be selected before the USFWS has finalized the marbled murrelet long-term conservation strategy
 - Pre-decisional
 - Result in arrearage



Diversify Revenue

- Convene a task force looking at alternative, sustainable sources of funding
- Generate revenue from carbon sequestration
- Generate revenue from ecosystem services



Additional Alternatives

- Add an alternative that includes the marbled murrelet “Conservation Alternative”
- Add an alternative that includes a higher harvest level
- New alternatives should be analyzed in RDEIS or Supplemental DEIS



Other Comments

- DEIS lacks economic assessment needed to assess fulfillment of trust mandate
- Effects on employment not considered
- Inaccurate inventory
- Amount of thinning



Other Comments

- Board lacks legal authority to select an arrearage option that identifies 462 MMBF of arrearage volume
- Select Alternative 2 as it is the only alternative that meets DNR's fiduciary responsibility
- Continue with Alternative 1 as it provides the highest harvest level



Next Steps

1. Respond to comments
2. Select a preferred alternative
3. Prepare Final EIS
4. Submit application to USFWS



Approval Process

Following application submittal to USFWS



USFWS

Completes biological opinion, findings, and record of decision



BNR

Decides whether to adopt conservation strategy

