

March 9, 2017

Commissioner of Public Lands and Board of Natural Resources
Department of Natural Resources

RE: SEPA File No. 12-042001: Long-term Marbled Murrelet Conservation Strategy Draft EIS

Dear Commissioner Franz & Board of Natural Resources,

We are writing to you today in response to the Draft EIS for the Marbled Murrelet Long-Term Conservation Strategy (MMLTCS).

We represent the Baker to Bellingham Recreation Advisory Committee and our diverse members are working to create high-quality, sustainable recreation opportunities for all recreationalists within Whatcom County and visitors to our area. We have just completed our first year of the 2 year planning process that will help determine appropriate locations and types of recreation on DNR-managed lands within Whatcom County.

Current Recreation in Whatcom County:

Of the 86,000 plus acres of land that DNR manages within Whatcom County, there are currently zero sanctioned trails or trail networks in the county. However, there are many unsanctioned trails on these DNR lands and other recreation opportunities such as camping and new trail development that our committee is looking at for future recreation in the planning area.

Alternatives Provided:

In looking at the DNR's range of alternatives for long-term strategy for the marbled murrelet, our group was understandably concerned how this could impact existing recreation and the development of new facilities and trails. Beyond looking at current nesting locations for the murrelet, the MMLTCS is also considering all future/potential nesting sites which could further limit current and future recreation opportunities.

Because there are zero sanctioned trails, trailheads and campgrounds on DNR-managed lands in Whatcom County, this could greatly impact our communities. The recreation advisory committee is diligently working to create designated areas for our diverse user groups. As these Alternatives increase in land protections for murrelet, they would greatly limit future options for new trails and recreation opportunities on DNR-managed lands within Whatcom County.

Alternative A (current HCP):

Our understanding is the current Habitat Conservation Plan (HCP) that guides the DNR's strategy isn't helping the murrelet recover. As a result, it seems likely that Alternative A (do what is currently being done) is not an option that will be taken.

Alternatives B and E:

Alternatives B & E seem to more closely align with new trail development opportunities though timing restrictions during the nesting season could impact construction of any new recreation opportunities. With Alternatives B and E, any new recreation opportunity that either goes near a Murrelet site or a potential nesting site would be reliant on approval from both the DNR and the U.S Fish & Wildlife Service- thus putting another step or potential roadblock into our recreational opportunities in Whatcom County and in Western Washington. We would like to know what would be involved in the USFWS consultation process for future recreation development.

Alternatives C & D:

In Alternatives C & D, the MMLTCS states no development of new or expanded recreation facilities, trails and recreation leases in Special Habitat Areas, occupied nesting sites and their buffers. Because Whatcom County's DNR land is undeveloped, we are very concerned that new trails and recreation facilities could not be developed. While our committee supports conserving Marbled Murrelet habitat, we cannot support the idea that no new trails could be developed in total. We understand that there may be some circumstances where new trail development should not occur, but we recommend that Alternatives C & D provide flexibility with trail development.

Alternative F:

Option F is the most aggressive protective management option for the murrelet; it would also present the most restrictions for several areas that our recreation advisory committee is currently considering for recreation. As a committee, we are concerned that removing 24,074 acres (28%) from our recreation planning inventory will impact our ability to provide recreational groups the opportunity to ensure a successful implementation.

Economic Impact:

The impacts to potential recreation opportunities extend beyond simply providing legitimate places to recreate in Whatcom County. The economic impacts from the loss of revenue felt by local businesses can be measured in real dollars. In a 2015 economic impact study, it concluded there was \$705 Million dollars spent annually on recreation in Whatcom County and there are 279 recreation businesses that provide more than 3,728 local jobs that bring \$508 million dollars to our economy.

Please understand that our recreation advisory committee is concerned for the long-term health of the murrelet. We are also working hard to create high-quality opportunities for Whatcom County residents and visitors to recreate on DNR-managed lands and feel they both can co-exist if done right. If these areas are shut out completely, our advisory committee believes that the use and construction of unsanctioned trail networks will proliferate, thus undermining the Marbled Murrelet Long-Term Conservation Strategy and the cooperation that has been forged between the DNR and the recreation user groups. When those trail networks take place, they remove the control/input from the organizations we represent and the DNR staff who are working hard to accommodate high-quality recreation while also managing for the Trust beneficiaries. Therefore, we believe it is in the best interest of the MMLTCS, the Baker to

Bellingham Recreation Advisory Committee and the Trust beneficiaries to examine the pre-existing trail systems on the landscapes and designate them where they meet the necessary standards and requirements with the intent of generating a successful MMLTCS.

Comment Period Extension:

Last, we request to have the comment period for the Draft EIS to be extended another 60 days to allow more informed comments from groups similar to ours and the general public. We feel that the comment period is too short for something that could have huge implications to recreation users. Members of our advisory committee intend to visit Olympia to speak to the Board of Natural resources directly, but we will not be able to make it prior to the March 9th comment deadline. When our group comes to speak to the Board in Olympia, we would like to ask for more time than the traditional 3 minutes allotted for speakers.

If you have any questions, please feel free to reach out to us directly. The planning advisory committee members contact information is attached.

Best Regards,

Baker to Bellingham Recreation Committee

Cc:

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