Board of Natural Resources
Oral Comments to Chair Report
November 7, 2017

I will be presenting a letter to you, signed by the Commissioners of the Port of Port Angeles, acknowledging and appreciating the significant effort the Board has dedicated to this selection process, but noting that we continue to have serious concern about the current process.

The 1997 HCP set aside 583,000 acres, 42% of the total timber acres, for habitat conservation for all species. Noted in ALL of the alternatives is that 583,000 acres of conservation in western Washington includes 154,000 acres of marbled murrelet habitat. That 583,000 acres is expected to produce an additional 152,000 acres of marbled murrelet habitat over the next 50 years. That would seem to be more than sufficient mitigation for the "take" in the Sustainable Harvest Calculation, but we see no acknowledgement of that.

We are scratching our heads trying to figure out why Alternative B is now labeled as "Unlikely" to meet ESA Issuance Criteria. When did that change? At the October 15, 2015 meeting of this Board, Kyle Blum, Deputy Supervisor for State Uplands, and Bridget Moran from US Fish and Wildlife Service, presented USFWS and DNR Proposed Alternatives. Here is a quote from those minutes on Page 3.

"Mr. Blum stated that the purpose of the DNR and USFWS presentation is to provide detail on the five jointly developed proposed alternatives for the marbled murrelet Long-term Conservation Strategy.

"Ms. Moran stated that the purpose of these proposed alternatives is a draft range of potential alternatives that represent conservation strategies to meet both agencies criteria. She stated that the joint agencies have developed a broad range of proposed alternatives through the SEPA/NEPA process as well as a range that represents a range of conservation strategies. Mr. Blum and

Ms. Moran identified key questions that help develop the proposed alternatives.

"The key questions are:

- Does the alternative address the Need, Purpose and Objectives?
- Does the alternative address the Endangered Species Act Section 10 issuance criteria?
- What habitat will be conserved?
- How will the forest be managed?
- How will potential impacts be mitigated?
- How will the alternatives affect the murrelet population?"

We cannot determine how and when Alternative B became "Unlikely", so in the name of Port of Port Angeles I am making a public records request for all documents and records since January 2014 between DNR and Fish and Wildlife and between DNR staff regarding marbled murrelet strategy.

We still believe that Alternative B continues to meet all criteria, and since Alternative B provides the most revenue for the trust beneficiaries, we continue to urge you to send Alternative B forward. Let Fish and Wildlife condition, with justification, Alternative B.

Thank you.

Connie Beauvais, Commissioner
Port of Port Angeles