



United States Department of the Interior

FISH AND WILDLIFE SERVICE
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In Reply Refer to:
FWS/IR9/ES

OCT -4 2019

Memorandum

To: Deputy Regional Director

From: ^{Acting} Assistant Regional Director - Ecological Services

Subject: Minor Amendment to Extend the Term of the Oregon Department of Forestry Safe Harbor Agreement and its Associated Enhancement of Survival Permit

The U.S. Fish and Wildlife Service (Service or USFWS) is proposing to approve a minor amendment to extend the term of the subject Safe Harbor Agreement (SHA) and its associated Enhancement of Survival Permit (Permit) for one year to August 31, 2029. The SHA and Permit cover Oregon Department of Forestry (ODF) activities in the Oregon Coast Ranges Study Area of the Service's experiment to remove barred owls to benefit the conservation of the threatened northern spotted owl (Experiment). The minor amendment was developed in response to the Service's August 28, 2019, decision to continue the Experiment through August 31, 2021.

Based on the information and findings presented below, I am requesting that you approve the subject action.

Experiment Background

On September 10, 2013, the Service signed a decision document to implement the Experiment and issued a scientific collection permit for this research. The Experiment implements Recovery Action 29 of the Revised Recovery Plan for the Northern Spotted Owl (Recovery Plan; USFWS 2011, p. III-65): "*Design and implement large-scale control [removal] experiments to assess the effects of barred owl removal on spotted owl site occupancy, reproduction, and survival.*" The Experiment is focused on acquiring information necessary to help identify effective management approaches and guide the implementation of appropriate management strategies for barred owls, in accordance with Recovery Action 30 of the Recovery Plan (USFWS 2011, p. III-65): "*Manage to reduce the negative effects of barred owls on spotted owls so that [stable population trends of spotted owls] can be met.*"

Strong evidence demonstrates that barred owls negatively affect northern spotted owls (spotted owls) and their populations. Without management intervention, competition from barred owls may cause extirpation of the spotted owl from all or a substantial portion of its historical range (USFWS 2013b, p. 1). The Recovery Plan identifies competition from barred owls as one of two

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primary threats to the spotted owl (USFWS 2011, p. III-62). To develop a barred owl management strategy that will conserve spotted owls, the Service needs information on the feasibility of potential management tools, including the removal of barred owls.

Decision to Continue the Experiment

On August 28, 2019, the Service decided to continue the Experiment through August 2021; for additional information on that decision, see <https://www.fws.gov/oregonfwo/articles.cfm?id=149489616>. The accompanying analysis and findings posted on the above webpage are incorporated here by reference. The results of the Experiment to date indicate a positive response in some aspects of spotted owl population demographics to the removal effects of barred owls, although areas of uncertainty remain. Continuation of barred owl removal through August of 2021 should allow us to validate if the initial positive spotted owl response to barred owl removal is not a result of natural variation within the forest ecosystem.

SHA Background

The Oregon Coast Ranges Study Area (Study Area) was chosen for the Experiment, in part, because it includes an ongoing spotted owl demography study area. This study provides long-term information that is useful in detecting spotted owl population responses to barred owl removal. While this area is focused on Federal lands, it also contains interspersed non-Federal lands. The Service sought access to some non-Federal lands for surveys and removal of barred owls that would allow the Service to complete the Experiment in the most efficient and complete manner and reduce the potential for pockets of productive barred owls to remain within the Study Area during the Experiment. To achieve that objective, in 2016, the Service signed SHAs with Roseburg Resources Co., Oxbow Timber I LLC, ODF, and Weyerhaeuser.

The current term of the ODF SHA and associated Permit is 13 years, ending on August 31, 2028. This term was established based on the assumptions that removal of barred owls on the Experiment would run for four years and following the end of removal efforts, barred owls would return to the treatment areas within the remaining term of the Permit. However, the Service anticipated that the Experiment might be continued beyond the initial estimated end date. Therefore, in the SHA and associated analyses, we specifically addressed the potential for continuation of the Experiment and our intent to extend the SHA and the Permit should that be needed.

“7.2 Safe Harbor Agreement Renewal

Upon the mutual written agreement of the Parties, and compliance with all laws then applicable, the USFWS may extend the permit and the Safe Harbor Agreement beyond its initial term. If barred owl removal on the experiment extends beyond 4 years, for a maximum of 10 years as described in the Record of Decision (USFWS 2013b), the USFWS would consider extending the permit for 5 additional years for all covered activities after the final removal season, and an additional 3 years for the harvest of timber sales in non-baseline sites and non-baseline areas outside of Thiessen polygons (Table 5) that are auctioned, sold and with a contract signed by

ODF prior to August 31 of the fifth year following removal, based on continuation of the existing baseline.” (Excerpt from the ODF SHA.)

Net Conservation Benefit

In proposing to extend the term of the SHA and Permit, the Service evaluated whether the revised duration is sufficient to provide a net conservation benefit to the spotted owl considering the duration of the planned activities, as well as the positive and negative effects associated with the Permit or the proposed continuation of the Experiment through August 2021.

The Service initiated the Experiment to gather crucial information for the development of a barred owl management strategy to conserve northern spotted owls, including the feasibility of barred owl removal as a potential management tool. Scientists, biologists, and managers have identified barred owl removal as the most realistic and practical tool described to date for such management.

To gather the strongest, most credible information from the Experiment, the Service chose to conduct the Experiment on ongoing spotted owl demography study areas, which include some interspersed non-Federal lands. In the SHA, we noted that while the Experiment can be implemented without access to non-Federal lands, absent that access the Service and U.S. Geological Survey researchers would lack access to important locations within the treatment area, creating pockets of extant barred owls within the treatment area. This would provide a source of barred owls to reoccupy spotted owl sites following removal of barred owls, and these barred owls could continue to displace spotted owls from these sites and areas, thus reducing the power of the Experiment to measure the utility of barred owl removal for purposes of conserving the spotted owl and potentially require extending the duration of the Experiment.

All of the currently occupied spotted owl sites on the Study Area are within the baseline and no incidental take of spotted owls resulting from forest management activities at these sites is authorized under the Permit. This includes all spotted owl sites with evidence of resident spotted owl occupancy within the five years prior to the signing of the ODF SHA. In fact, the reduction of barred owl populations on the treatment area may actually increase the probability that spotted owls will be able to remain on these currently occupied sites. This remains the case under the extension of the Permit, and early results of the Experiment show higher survival rates for spotted owls within the treatment area compared to the areas where no barred owls are removed.

If barred owl removal does allow spotted owls to reoccupy sites that are not currently occupied (non-baseline), ODF will be allowed to take these spotted owls. It is highly unlikely that these sites would be reoccupied by spotted owls without the removal of barred owls. The Service anticipates that the barred owls will again displace spotted owls from these sites as the barred owl population rebuilds over the following three to five years once the Experiment is completed. Thus, the spotted owl presence on these sites is temporary in all cases. In developing the

Experiment and assessing its effects, the Service did not anticipate long-term conservation value from the spotted owls that might reoccupy historic sites in the Study Area.

The extension of the SHA and Permit for one year does not change the conservation value of the information gained, the temporary protection of currently occupied spotted owl sites, and the potential short-term spotted owl occupancy of currently unoccupied sites. For these reasons, the proposed extension does not change the Service's determination that this SHA and Permit provide a net conservation benefit for spotted owls.

Analysis of the Environmental Assessment

The Service analyzed the effect of a potential future extension of the SHA in the Final Environmental Assessment (EA) addressing the Service's original proposed action to sign the SHA and issue the Permit (USFWS 2016a, p 9):

"In the FEIS and the ROD for the Experiment, the USFWS noted that if the spotted owl response to removal of barred owls is not as strong as anticipated, the Experiment could be extended to include up to 10 years of barred owl removal. On that basis, in this EA, we have analyzed the expected term of the Permit (13 years) and a Permit term of 18 years (with the limited take authorization in the last 3 years of the Permit term as described in the previous paragraph above) in the event the Experiment needs to be extended and ODF requests an extension of the Permit. The USFWS acknowledges that an amendment to extend the Permit may require additional NEPA compliance if we determine it would increase the amount of incidental take of listed species or cause effects on the human environment not previously considered."

In the EA, the Service noted the potential for an increase in spotted owl site occupancy as a result of the Experiment, and also noted that this was likely a short-lived improvement because barred owls are anticipated to reoccupy these sites soon after completion of the experimental removal. The Service analyzed the effect of both the initial Permit term, and the potential for an extension of the Permit for up to 18 years in the event the removal was continued for the full 10 years. The current proposal extends the Experiment by only two years, and the effects of extending the Permit to August 31, 2029 are well within the effects analyzed in the EA:

"3.1.2 Effects on Spotted Owls under the Action Alternative

Under the Agreement and Permit, ODF would be authorized during the Experiment to incidentally take spotted owls that may reoccupy up to 18 historic, but currently unoccupied, spotted owl sites and other areas outside of baseline sites not known to have been previously occupied by spotted owls. ODF would be authorized to incidentally take spotted owls at these sites and areas during the Experiment and for an additional 5 years (for a total of 10 years) with allowances for an additional 3 years for timber sales at non-baseline spotted owl sites that have become occupied by spotted owls due to barred owl removal and that were sold with contracts signed prior to August 31, 2025. Spotted owls

have not been detected on these non-baseline sites for five or more years.” (Excerpt from the EA addressing the ODF SHA and Permit.)

As noted in the EA, the Experiment is short-term and we estimated that barred owl populations would return to pre-removal levels within three to five years of the end of the barred owl removal (USFWS 2013a, p. 148-9). Based on the rate of barred owl reoccupation of cleared sites in the Oregon Coast Ranges during the first four years of removal (Wiens et al. 2019), this estimate remains accurate. Thus, any spotted owls that do reoccupy historic sites as a result of barred owl removal on accessible Federal lands would again be displaced within five years post-experiment, as anticipated. The conservation value of the Experiment is primarily in the information on the effect of barred owl removal on spotted owl populations, the cost of such removal, and potential methodologies, and the value of this information to the development of a long-term barred owl management strategy. We did not anticipate long-term conservation benefits to the spotted owls that might reoccupy historic sites in the Study Area.

Effects to Spotted Owl Critical Habitat

In the EA, the Service noted that “the maximum potential effect of the proposed Agreement and Permit is the removal or degradation of up to 3,345 acres of spotted owl critical habitat (CH) during the Permit term.” For the analysis of effects in the EA, the Service assumed the removal of up to this maximum amount of spotted owl nesting/roosting habitat on each of the affected CH subunits. Thus, the analysis already accounted for the maximum effect on CH and the extension of the SHA and Permit term for one year does not change this potential effect; it only spreads it over the one additional year.

For CH Unit 2, Subunit 2, the Service concluded “[t]his level and distribution of CH loss is not likely to appreciably reduce the conservation value/function of the CH subunit for demography support of the CH unit or overall spotted owl population based on the fact that the vast majority of CH within this subunit occurs on Federal lands. Because of the scattered nature of ODF lands that may be affected, the loss of up to 3,345 acres of ODF lands would not appreciably affect the north-south connectivity between CH subunits.”

For CHU 2, Subunit 3, the Service noted that there are only 410 acres of spotted owl CH on ODF lands covered by the Permit. Assuming all 410 acres were lost, the Service concluded “[t]his level and distribution of CH loss on ODF lands would not appreciably reduce the conservation value/function of the CH subunit for demography support of the CH unit or the overall spotted owl population, in part because the vast majority of CH habitat within this subunit occurs on Federal lands. Because of the scattered nature of ODF lands that may be affected, CH loss on ODF lands would not appreciably affect the north-south or east-west connectivity between CH subunits.” (Excerpt from the EA.)

Incidental Take of Spotted Owls under the Permit

The Service anticipated the incidental take of spotted owls that may reoccupy up to 18 non-baseline spotted owl sites on ODF lands during the Experiment and for eight years following the end of the Experiment. The primary cause of take would be the loss of habitat to forest

management activities. In the EA, the Service assumed the loss of all 3,345 acres of unprotected spotted owl nesting/roosting habitat from ODF lands within the non-baseline spotted owl sites during the duration of the Permit. Thus, the extension of the Permit does not change the area of habitat covered by the Permit and the potential incidental take from habitat loss, but simply extends the potential impact over one additional year. In the EA, the Service determined that this incidental take from disturbance of nesting spotted owls is not likely to represent a significant impact on spotted owls in the Study Area due to the short duration of forest management activities that might disturb spotted owls, the limited period of time in the early portion of the nesting season during which noise may disturb spotted owls, and the relatively short distance over which disturbance due to noise is anticipated. This situation does not change with the extension of the Permit by one year.

In terms of spotted owl habitat loss and incidental take, the continuation of the Permit through August 31, 2029 does not change the environmental effects of the Permit on spotted owls.

Biological Opinion

We conducted a review of the Biological Opinion (Opinion) addressing the proposed SHA and Permit (USFWS 2016b) to determine if extension of the SHA and Permit through August 31, 2029 would require reinitiation of consultation (see Attachment). The amount or extent of incidental take of spotted owls included in the Incidental Take Statement accompanying the Opinion has not been exceeded and is not projected to be exceeded under the extension of the SHA. There is no new information that indicates any increase in effects to listed species or CH not considered in the Opinion. The SHA and Permit have not been modified in a manner that causes effects to listed species or CH not considered in the Opinion. Finally, no new species have been listed or CH designated that may be affected by the continuation of the Experiment. Therefore, no reinitiation of consultation is required.

Finding of No Significant Impact

Based on the information presented in the EA and the SHA, the Service found that the proposed issuance of the Permit to ODF for incidental take of spotted owls that may reoccupy currently unoccupied sites and areas as a result of the SHA was not likely to significantly affect the quality of the human environment for the following reasons. This rationale remains valid with the extension of the SHA and Permit through August 31, 2029, and the Finding of No Significant Impact (FONSI) remains adequate.

The Permit authorized the incidental take of spotted owls resulting from forest management activities that may reoccupy non-baseline sites or areas where resident spotted owls had not been detected in the five years prior to the signing of the SHA despite extensive surveys. These sites and areas were unlikely to be reoccupied by spotted owls unless barred owls were removed from the area. Any non-baseline sites that became occupied by spotted owls during the Experiment

would likely be lost as barred owls repopulate the area following the end of the Experiment. This remains the case under the extension.

No incidental take of spotted owls was authorized under the Permit for currently occupied sites (those with at least one resident spotted owl over the five years prior to the signing of the SHA). By providing access to lands and roads for the survey and removal of barred owls as part of the larger Experiment, spotted owl sites are more likely to remain occupied in these areas during the period of the SHA. This remains the case under the extension, and early results from the Experiment show higher survival rates for spotted owls within the treatment area compared to the areas where no barred owls are removed.

The conservation value of the Experiment, and this SHA which supports the Experiment, is the information the Service will gain about the feasibility and efficiency of removal as a tool for barred owl management. This information will be crucial for the development of long-term barred owl management strategies to support the survival and recovery of the spotted owl.

Conclusions

When the ODF SHA and the associated Permit were issued, the Service was aware that the Experiment might be continued beyond the initial estimate of four years. Therefore, in the SHA and associated analyses, we specifically addressed the potential for continuation of the Experiment and our intent to extend the Permit if this occurred. All analyses related to the issuance of the SHA and Permit were conducted assuming the potential for the SHA and Permit to be extended for up to 15 years, i.e., through 2033. The environmental effects of the proposed extension to the end of August 2029 is well within the scope of effects already analyzed in the EA.

The conservation value of the Experiment is primarily in the information on the effect of barred owl removal on spotted owl populations, the cost of such removal, and potential methodologies, and the value of this information to the development of a long-term barred owl management strategy. We did not anticipate long-term conservation benefits to the spotted owls that might reoccupy historic sites in the Study Area. The extension of the SHA and Permit to August 31, 2029, does not change the conservation value of the information gained, the temporary protection of currently occupied spotted owl sites, and the potential short-term spotted owl occupancy of currently unoccupied sites. Thus, the proposed extension does not change the Service's determination that this SHA and Permit provide a net conservation benefit for spotted owls.

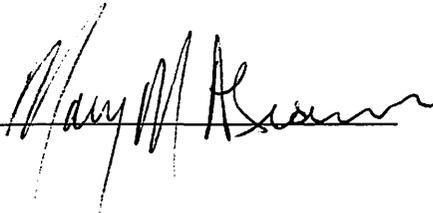
In terms of spotted owl habitat loss and incidental take, the continuation of the Permit through August 31, 2029, does not change the environmental effects of the Permit on spotted owls, but rather extends the effects over one additional year. Based on the information presented in the EA and the SHA, the Service found that the proposed issuance of the Permit to ODF for incidental take of spotted owls that may reoccupy currently unoccupied sites and areas as a result of the SHA was not likely to significantly affect the quality of the human environment. No reinitiation of consultation on the SHA and Permit is required. Based on our review of current

information and circumstances, the amendment of the SHA and extension of the Permit through August 31, 2029, does not alter the FONSI.

Therefore, I recommend extension of the term of the ODF SHA and Permit through August 31, 2029.

Recommendation

I request that you concur with the above findings that proposed extension of the ODF SHA and Permit do not require supplementation of the EA, reinitiation of Section 7 consultation, or change the FONSI. I further request that you approve the extension of the ODF SHA and Permit through August 31, 2029.

Concur:  Do not Concur: _____

Date: 7 Oct 2019 _____ Date: _____

Attachment

Literature Cited

- U.S. Fish and Wildlife Service. 2011. Revised Recovery Plan for the Northern Spotted Owl (*Strix occidentalis caurina*). Portland, Oregon.
- U.S. Fish and Wildlife Service. 2013a. Final Environmental Impact Statement for the Experimental Removal of Barred Owls to Benefit Threatened Spotted Owls. Portland, Oregon.
- U.S. Fish and Wildlife Service. 2013b. Record of Decision for the Experimental Removal of Barred Owls to Benefit Threatened Spotted Owls. Portland, Oregon.
- U.S. Fish and Wildlife Service. 2016a. Final Environmental Assessment addressing the Proposed Issuance of an Endangered Species Act Enhancement of Survival Permit for the Oregon Department of Forestry Safe Harbor Agreement for the Northern Spotted Owl in Lane County, Oregon. Portland, Oregon.
- U.S. Fish and Wildlife Service. 2016b. Biological Opinion addressing the Proposed Issuance of an Endangered Species Act Enhancement of Survival Permit for a Safe Harbor Agreement for the Northern Spotted Owl between the Oregon Department of Forestry and the U.S. Fish and Wildlife Service. Portland, Oregon.
- U.S. Fish and Wildlife Service and the Oregon Department of Forestry. 2016. Safe Harbor Agreement for the Northern Spotted Owl with Oregon Department of Forestry in the Oregon Coast Ranges Study Area for the Barred Owl Removal Experiment.
- Wiens, J.D., Dugger, K.M., Lesmeister, D.B., Dilione, K.E., and Simon, D.C., 2019, Effects of Barred Owl (*Strix varia*) removal on population demography of Northern Spotted Owls (*Strix occidentalis caurina*) in Washington and Oregon, 2015–18: U.S. Geological Survey Open-File Report 2019-1074, 17 p.

Attachment: The Service's evaluation of whether the proposed extension of the ODF SHA and Permit trigger reinitiation of consultation on the original SHA and Permit actions.

The original consultation on the ODF SHA and Permit actions culminated in the Opinion (Service 2016b), which includes findings that the proposed SHA and Permit are not likely to jeopardize the spotted owl or destroy or adversely modify spotted owl critical habitat (CH). The objective of this evaluation is to determine if the analyses and findings presented in the Opinion are still valid or whether one or more of the reinitiation criteria at 50 CFR 402.16 are triggered.

Reinitiation of formal consultation is required where discretionary Federal agency involvement or control over the Federal action at issue has been retained (or is authorized by law) and if: (1) the amount or extent of any incidental take caused by the action is exceeded; (2) new information reveals effects of the action agency that may affect listed species or critical habitat in a manner or to an extent not considered in the Opinion; (3) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in the Opinion; or (4) a new species is listed or critical habitat designated that may be affected by the action.”

The results of our evaluation are presented below in relation to each of the reinitiation criteria described above.

Reinitiation Criterion 1: The proposed extension of the SHA and Permit term will not change the amount of agreed upon take analyzed in the September 2, 2016, Opinion. In the Opinion, the Service assumed that all remaining spotted owl nesting and roosting habitat on non-baseline sites and areas administered by ODF could be removed under the Permit by the end of the Permit term on August 31, 2025. This extension of the term of the SHA and Permit simply extends the period over which that take will occur. Because the Service had already assumed and analyzed the effect of the loss of all remaining spotted owl habitat, this will not increase the amount of take. Extending the period over which that take will occur by one additional year does not change the effects of the take on the spotted owl.

Reinitiation Criterion 2: There is no new information available that reveals increased effects to the spotted owl or its designated CH caused by the proposed extension of the SHA and Permit that were not analyzed in the original consultation.

As discussed in the effects analysis of the September 2, 2016 Opinion, the SHA and Permit allow ODF to incidentally take spotted owls that may reoccupy sites considered unoccupied at the time of the Permit as a result of the Barred Owl Removal Experiment (Experiment). Without the SHA, ODF could have immediately removed the surveyed and unoccupied spotted owl habitat as there are no restrictions to harvest of unoccupied habitat. During the Experiment, the remaining resident spotted owls on the covered lands of the SHA and which are not covered under the Permit, will benefit from reduced competitive pressure of the barred owls.

The conservation value of the Experiment and of this SHA, which supports the Experiment, is information on the feasibility and efficiency of lethal removal as a tool for barred owl management. By allowing a more complete removal effort, stronger and timelier results are

likely. Failure to access these roads and lands could result in pockets of barred owls remaining within the treatment area, reducing the effect of the removal and potentially extending the length of the Experiment and delaying the development and implementation of any future barred owl management strategy. All of these analyses remain valid under the extension of the SHA and Permit to August 31, 2029.

Spotted owl CH is designated on ODF lands covered under this SHA. In the September 2, 2016, Opinion, the Service noted the CH that overlaps the SHA is located in Unit 2 (Oregon Coast Ranges), Subunits 2 and 3. The maximum potential effect of the issuance of the Permit is the removal or degradation of up to 3,345 acres of spotted owl habitat, as defined in the SHA. We anticipate that this removal will be spread across both CH subunits. However, the actual location of the habitat removal will only be known once timber sale planning is complete. Therefore, we analyzed the effect to CH based on the assumption that the entire 3,345 acres could be removed from within the subunit within the Permit period.

CH Unit 2, Subunit 2 was designated to function primarily for demographic support to the overall spotted owl population and north-south connectivity between subunits. If the entire 3,345 acres of spotted owl habitat covered by the Permit were removed from ODF lands within this Subunit, this would represent a loss of nesting/roosting habitat on less than 1.3 percent of the Subunit. This limited level of habitat loss would not appreciably reduce the conservation value of the CH Subunit for demography support of the overall spotted owl population and the scattered nature of ODF lands means that any habitat loss would not appreciably affect the north-south connectivity between subunits.

CH Unit 2, Subunit 3 contains only 410 acres of spotted owl habitat on ODF lands. Therefore, this is the maximum level of harvest of spotted owl nesting/roosting habitat that could occur as a result of issuance of the Permit. This subunit was designated to function primarily for demographic support to the overall population and for both north-south and east-west connectivity between subunits. If the entire 410 acres of spotted owl habitat on ODF lands within this Subunit that is covered by the Permit were removed, this would represent a loss of nesting/roosting habitat on less than 0.2 percent of the Subunit. This very limited level of habitat loss would not appreciably reduce the conservation value of the CH Subunit for demography support of the overall spotted owl population, and the limited and scattered nature of ODF lands means that any habitat loss would not appreciably affect the north-south or east-west connectivity between subunits.

At the regional scale, 3,345 acres of habitat loss in CH Unit (2) would represent only 0.4 percent of the Unit and at the scale of the full designation, this represents less than 0.04 percent of northern spotted owl CH. Based on the limited effect to CH, which will retain its capability to provide its intended conservation function with this loss, and the fact that this loss of habitat was fully anticipated and evaluated in the 2016 Opinion analysis, the extension of the SHA and Permit term will not increase effects to spotted owls or its CH. The Permit term extension will simply extend the timeframe during which these effects could occur.

Reinitiation Criterion 3: The extension of the SHA and Permit term from August 31, 2028, through August 31, 2029, is the only change in the action from the description of the action in

the original Opinion and fits within its scope of the analysis. The effects of the SHA and Permit were based on the amount of take authorized, resulting from the loss of spotted owl nesting/roosting habitat in the non-baseline sites and areas. The level of take and potential loss of habitat are not changed by the extension of the SHA and Permit term. Therefore, the agency action has not been modified in a manner that causes an effect to the listed species or CH not considered in 2016 Opinion.

Reinitiation Criterion 4: No new species have been listed or critical habitat designated that could be affected by the proposed action.

Based on the preceding analysis of the reinitiation criteria, the Service determines that reinitiation of the Opinion is not necessary for the extension of the term of the SHA and Permit through August 31, 2029.

Finally, a review of the 2013 and current Status of the Species for the spotted owl shows that the threats to the spotted owl, the range wide environmental baseline and population numbers of spotted owls are similar. The most recent demography analysis covered population trends through 2013. A new demography analysis will be conducted in early 2020. Based on annual reports, we anticipate that spotted owl populations have continued to decline since the last demography analysis. We do not anticipate that the extension of the SHA and Permit term will negatively affect the status of the spotted owls and may, in fact, temporarily improve population numbers because as barred owls are removed from ODF lands, spotted owls are more likely to nest and reproduce in their historic territories on those lands.