



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Washington, DC 20240
<http://www.blm.gov>

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Rowan Gould
Acting Director
U.S. Fish and Wildlife Service
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

SUBJECT: Status of the *2010 Revised Recovery Plan for the Northern Spotted Owl* for BLM-administered lands in Western Oregon

Dear Mr. Gould:

The Bureau of Land Management (BLM) supports the recovery goals for the Northern Spotted Owl, and I would like to express my appreciation for the U.S. Fish and Wildlife Service's (FWS) willingness to work with the BLM on this important effort. The BLM and the FWS have been working cooperatively, holding joint workshops and participating in a number of interagency meetings. I strongly support continued interagency cooperation during development of critical habitat for the spotted owl and am seeking your commitment that the FWS seriously consider utilizing the most up-to-date peer-reviewed scientific data for BLM-managed lands, including models we have developed that can project habitat changes into the future and evaluate different management scenarios. I believe it is imperative that our agencies continue to work together to create a successful recovery effort for the spotted owl.

I. Current Status of the Revised Recovery Plan

In the near-term, the Revised Recovery Plan, as currently written, is likely to have few or limited effects on the timber program. Many of the timber sales for FY 2011 and FY 2012 programs have undergone Endangered Species Act (ESA) section 7 consultation and incorporated many of the Revised Recovery Plan concepts. The BLM has offered more than 90 percent of the timber volume from thinning activities since 2004, and harvest plans for 2012 and 2013 continue this trend. Continuation of this type of timber program at current harvest levels will remain compatible with the Revised Recovery Plan in the near term; however, there is a diminishing supply of young stands suitable for thinning.

The pool of thinning acres is being harvested at 2-3 times the rate envisioned under the Northwest Forest Plan. The effect of accelerated implementation of non-controversial thinning will result in reduced capability to continue to provide the harvest levels of recent years. For the next few decades treatments to enhance Late-Successional Reserve

objectives will continue to supplement the Allowable Sale Quantity in annual timber sales.

Since release of the draft Recovery Plan in September, our agencies have worked to clarify and revise many parts of the draft plan that were the subject of BLM concerns expressed in their comments dated December 15, 2010, including Recovery Actions 10 and 32 and the “no net loss” recovery criterion. We believe that the resulting changes in the plan improve its clarity and will reduce the impacts on timber production from those that were projected to be possible in BLM’s December comments. As a result, those projections should no longer be considered operative. BLM appreciates the recognition in the plan for active forest management, and the commitment of the FWS staff to engage cooperatively with BLM to implement the plan on a day to day basis, just as both agencies are currently working together toward the successful completion of the ongoing pilot projects.

II. Recovery Plan Implementation and Future Work

The BLM supports the recovery goals in the Recovery Plan and is interested in strengthening the ability of the BLM to successfully implement it. We are supportive of the FWS’s efforts to use new modeling approaches to develop a reserve network and evaluate high value habitat areas between reserve blocks. These approaches will likely prove useful in developing a future critical habitat designation. The Revised Recovery Plan infers that the modeling outputs will identify additional areas for protection; however, the models do not yet incorporate habitat change over time.

Incorporating a habitat development component into the modeling efforts is a key issue for the BLM. The BLM has developed very detailed information and analysis on the capabilities of BLM’s portion of the spotted owl range which are not available for the other Federal lands. This includes projections of how spotted owl habitat will potentially develop on the BLM lands over time and how individual stands can form into blocks of habitat. The habitat projection models currently being used are limited only to static habitat and do not take advantage of this existing information which could significantly influence how any reserve network is determined and the designation of critical habitat. In fact, peer review comments also recognized the limitations of a habitat projection model based on static habitat. This detailed information is particularly relevant to understanding the future capability of BLM’s checkerboard ownership pattern contribution to forming larger blocks of habitat.

In addition, the BLM has also evaluated a wide range of management scenarios for the BLM lands that include analysis of spotted owl habitat development, timber production, economics, and development of forest structural stages over time. This work provides insights into the effects of various management strategies on a variety of resources and gauges the effectiveness of different strategies.

An integrated approach of the FWS and BLM’s information would illustrate outcomes of alternative recovery reserve networks and allow for the management

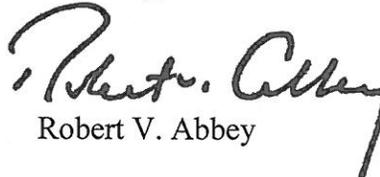
evaluation of tradeoffs and risk in reaching decisions which will affect management of the BLM lands. Specifically, the BLM proposes:

- Discussing alternative modeling scenarios that would provide equal or better contribution to the recovery needs of owls from BLM lands.
- Incorporation of habitat in-growth into modeling for recovery strategies and development of critical habitat boundaries.
- Utilization of the most current and best available forest inventory data for BLM lands.
- Utilization of BLM projections of how spotted owl habitat develops on BLM lands over time and how individual stands form habitat blocks over time; a critical component necessary to inform identification of high-value areas for Recovery Action 10.
- Utilization of BLM data for habitat areas already within reserved areas such as riparian management areas.

The BLM appreciates the definitive commitment from FWS to work together to determine how to best utilize this information.

We look forward to this feedback and other efforts to further collaborate on the many aspects of Recovery Plan implementation. We appreciate the FWS's efforts to complete consultation on our timber sales and anticipate the need for continued technical assistance as we transition to Recovery Plan implementation and the FWS begins its development of critical habitat.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert V. Abbey". The signature is written in a cursive style with a large initial "R".

Robert V. Abbey