United States Department of the Interior

FISH AND WILDLIFE SERVICE

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October 28, 2015

Patricia A. Grantham
Forest Supervisor, Klamath National Forest
1711 South Main Street
Yreka, CA 96097

Dear Ms. Grantham:

We are writing you as the lead U.S. Fish and Wildlife Service (Service) office responsible for northern spotted owl (spotted owl) recovery planning. We were requested by the Yreka Fish and Wildlife Office (YFWO) to consider the Westside Fire Recovery Project and offer any insights or recommendations regarding how this project may affect spotted owl recovery. We have reviewed the FEIS, associated documents, and relevant correspondence between our two agencies. According to the Forest Service's biological assessment, it is estimated that up to 70 spotted owl activity centers may be adversely affected by the proposed action. It is our understanding that you are currently engaged with the YFWO in consultation under section 7 of Endangered Species Act (ESA). Consistent with the requirements of the ESA, we offer the following comments to facilitate the planning and implementation of this project in a manner that reduces the potential for adverse impacts to spotted owls and long-term spotted owl recovery.

The Service supports using the best available science to implement fuels management projects and to restore more natural and characteristic fire regimes. Given the spotted owl's current population trend, the 2011 Revised Recovery Plan for the Northern Spotted Owl (http://www.fws.gov/oregonfwo/documents/RecoveryPlans/NSO_RevisedRP_2011.pdf) calls for retaining existing spotted owls on the landscape to the greatest possible extent throughout the species' range. Our overarching recommendation is for land managers to use the full suite of management tools (e.g., mechanical treatments, prescribed burning, let-burn policies, etc.) to "move" forest landscapes to fire regimes that are more characteristic and natural consistent with the ecological setting. Ideally, the optimal result of this approach will be landscapes that are ecologically less homogenous and thus less susceptible to more extreme and catastrophic wildfire events, while also supporting the full complement of biodiversity native to these landscapes, including spotted owls.

The Service supports implementation of fuels management and forest health restoration projects to improve long-term forest health even if the projects adversely affect spotted owls in the near term. Our goal is to strike a balance in reaching this goal, that is, maintain sustainable spotted owl populations in the short term while land managers restore healthier forest conditions in the long term. Sometimes this is a delicate balancing act, and we appreciate the challenges these tradeoffs present to you and other land managers. (Of course, if the land manager determines an emergency exists, then we recommend immediate application of the Endangered Species Act emergency consultation procedures to address pressing issues of public safety and protection of property.)

Low, moderate and, in some cases, high-severity fires maintain habitat conditions conducive for spotted owls, and we recommend minimizing salvage or harvest activities in areas where spotted owls remain post-fire. With that said, the Service and the Revised Recovery Plan encourage fuels management and thinning projects that reduce ladder fuels (small trees and shrubs that can carry a ground fire into the canopy resulting in stand-replacing events) but that retain the stand canopies, which are very important to spotted owls. The Service also promotes siting fuel reduction zones in areas where other breaks already occur, such as roads, landings and meadows. This increases the effectiveness of the fuel breaks while maintaining existing areas of spotted owl habitat. We also recommend placing fuel reduction zones in areas of non-habitat, which are often more dense than spotted owl habitat and at a higher fire risk. This would increase the effectiveness of fuels management treatments while reducing potential negative impacts to spotted owl conservation. The Revised Recovery Plan incorporated the latest science on landscape-level planning, and more recent research since publication of the plan has tended to affirm these recommendations (e.g., Fontaine and Kennedy 2012, Miller et al. 2012, Stephens et al. 2012, Ager et al. 2013, Churchill et al. 2013, Clark et al. 2013, Haugo et al. 2015).

In general, most scientists agree that salvage logging does not contribute positively to the ecological recovery of naturally disturbed forests (Lindenmayer et al. 2008, pg. 12-13, 168). In our experience many post-fire salvage projects tend to be more opportunistic than part of a larger-scale, proactive strategic planning effort to reduce fire spread and severity. Such a larger-scale effort could include landscape level considerations for both fuel reduction and strategic fire breaks while incorporating considerations for spotted owls and other land management priorities. Recovery Action 12 in the Revised Recovery Plan recommends retaining post-disturbance legacy structures (such as large, dead trees, whether standing or down) in areas that are managed for spotted owl habitat because these features greatly improve the quality of the habitat as it recovers over time. It is important for action agencies to seek ways to implement important fuel reduction work without overutilizing salvage logging that can adversely affect the restoration of natural conditions.

We are also concerned if aspects of salvage logging operation targeted to public safety or forest health improvement are financially underwritten by commercial harvest of on-site timber (i.e., wildlife legacy structure) that would otherwise be retained to meet forest health or wildlife conservation goals. If that is the case with parts of the Westside Project, we recommend that you consider alternative sources of implementation funding that would reduce impacts to forest health and wildlife. We greatly appreciate the budget constraints under which the Forest Service is operating and the need to consider such funding sources. However, we suggest alternative approaches may be more cost effective in the long run given the high level of controversy

associated with this project and the potential for costly litigation. For this reason we also believe that such challenges may delay implementation of the important public safety components of the project. We would be happy to discuss this recommendation with you and Forest Service leadership if you believe it would be helpful.

Thank you for the opportunity to provide you these comments. Please feel free to contact me any time at 503-231-6179.

Sincerely,

Paul Henson

Paul Henson, Ph.D.
State Supervisor

Literature Cited:

Ager, A. A., et al. 2013. Restoration of fire in managed forests: a model to prioritize landscapes and analyze tradeoffs. *Ecosphere* 4:1-19. http://dx.doi.org/10.1890/ES13-00007.1

Churchill, D.J., et al. 2013. Restoring forest resilience: From reference spatial patterns to silvicultural prescriptions and monitoring. *Forest Ecology and Management* 291: 442–457.

Clark, D.A., et al. 2013. Relationship between wildfire, salvage, logging, and occupancy of nesting territories by northern spotted owls. *Journal of Wildlife Management* 77:672–688.

Fontaine, J.B., and P.L. Kennedy. 2012. Meta-analysis of avian and small-mammal response to fire severity and fire surrogate treatments in U.S. fire-prone forests. *Ecological Applications* 22:1547–1561.

Haugo, R., et al. 2015. A new approach to evaluate forest structure restoration needs across Oregon and Washington, USA. *Forest Ecology and Management* 335:37-50.

Lindenmayer, D.B., P.J. Burton, and J.F. Franklin. 2008. *Salvage Logging and Its Ecological Consequences*. Island Press, Wash., DC. 227 pgs.

Miller, J.D., et al. 2012. Trends and causes of severity, size, and number of fires in northwestern California, USA. *Ecological Applications* 22: 184–203.

Stephens, S.L., et al. 2012. The effects of forest fuel-reduction treatments in the United States. *BioScience* 62(6):549-560.

CC: B. Gyant, USFS (Region 5)
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