



STATE OF WASHINGTON

February 26, 2007

Dave Wesley
Paul Phifer
U. S. Fish and Wildlife Service
911NE 11th Avenue
Portland, Oregon 97232

Dear Dave and Paul:

As active participants on the Spotted Owl Recovery Team (Team), with this letter we provide comments on the latest spotted owl recovery plan options.

GENERAL COMMENTS

We compliment you and the Interagency Support Team (IST) on the hard work and professionalism exhibited throughout the recovery planning process.

We want to highlight the importance of the NW Forest Plan to the conservation of the spotted owl in Washington State, as well as the overall stability of forest management in our state; which makes collaborative conservation possible for the spotted owl and many other species. The NW Forest Plan serves as the backbone for forest-dependent species conservation, as well as protection of abundant clean water. We are apprehensive about any movement away from this plan. Efforts to adjust the plan should focus on improved implementation to more effectively achieve the original goals, rather rescinding or substantially revising the structure of the plan.

We feel it is essential that policy makers, managers, and scientists work together to fulfill the barred owl actions prescribed in the recovery plan. Neither scientists nor managers, by themselves, will be able to achieve necessary conservation outcomes.

RECOVERY PLAN OPTIONS

Option One

We believe Option One is the better approach to recovery of the spotted owl. This option has received the majority of the Team's attention and is more firmly and directly connected to the best available science. It also is a near-consensus product of the Team's deliberations. We believe this option better meets the federal requirements for recovery plans and has a greater chance of success compared to Option Two.

We have few specific comments on Option One that we have not already discussed with the Team. It is important to follow through on the scientific review tasks that the Team agreed upon in September 2006, particularly a peer review of the provincial habitat targets. We would also like feedback from the scientific community as to whether more active approaches are needed to prevent catastrophic habitat loss from wildfire. We hope these reviews can begin right away so this information can be considered for the final draft recovery plan.

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We urge the U. S. Fish and Wildlife Service (Service) to advance Option One to the federal register without major changes in conservation approach.

Option Two

Although some improvements have been made to the rule set at the heart of Option Two, we believe this option represents a riskier approach to spotted owl recovery. This option was directed by executives in charge of the federal land management agencies, involved the Recovery Team primarily in a review capacity, and is not a consensus product. Option Two contains greater uncertainty, primarily due to the lack of map-based conservation areas and clear habitat targets. For implementation, this option relies heavily upon the federal forest planning process which we understand was recently revised to eliminate NEPA review, replace “standards” with “guidelines”, and delegates many significant decisions and analyses to project-level plans.

We are particularly concerned that up to 45% of large habitat blocks’ gross area, and even larger proportions of small habitat blocks’ gross area may be situated on non-federal lands. This is potentially a huge redistribution of conservation responsibility from federal to non-federal lands compared to both Option One and the status quo. This action swamps the relationship between federal habitat blocks and non-federal Conservations Support Areas (CSA’s) that is carefully described in Option One.

It appears that Option Two will result in protection of less suitable habitat on federal lands than Option One or the status quo (i.e. the NW Forest Plan). We question whether it is wise to reduce habitat protection for a declining threatened species, particularly in Washington State where spotted owl populations are rapidly declining.

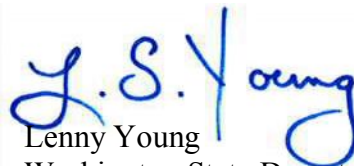
In closing, we wish to remain actively engaged in the recovery planning process. More broadly, it is important to continue a cooperative relationship between Washington State and federal agencies on a wide array of topics related to forest management and fish and wildlife conservation.

Thank you Dave, Paul, and the entire IST for your strong commitment to spotted owl recovery.

Sincerely,



John Mankowski
Office of Governor Chris Gregoire
Natural Resources Policy Advisor



Lenny Young
Washington State Department of Natural Resources
Forest Practices Division Manager

cc: Recovery Team Members