

Congress of the United States
Washington, DC 20515

March 8, 2011

The Honorable Ken Salazar
Secretary of the Interior
Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Secretary Salazar:

As you may know, last November a number of Northwest Members of Congress wrote you to express strong concerns about the U.S. Fish and Wildlife Service's (FWS) Northern Spotted Owl Draft Revised Recovery Plan (Draft Plan) and to request that the public be given additional time and information to comment on the Draft Plan. Many of those concerns remain unaddressed by the FWS.

While the FWS granted a scant 30-day extension to the public comment period, little has been done to address the primary concerns related to a lack of transparency and scientific justification, including the modeling, that underpin the Draft Plan. This is particularly troubling in light of the sweeping new policies being proposed by the FWS, including a complete departure from the Northwest Forest Plan (NWFP), the inclusion of private lands, and recovery actions that would further cripple federal forest management activities throughout the range of the spotted owl.

We have recently been made aware of official comments and analysis provided to the FWS by the U.S. Forest Service and Bureau of Land Management (BLM). These documents raise serious doubts about the FWS process employed thus far to develop the Draft Plan, as well as the underlying rationale for the FWS's recommendations. Specifically, in a January 21, 2011 letter, the Deputy Chief of the Forest Service wrote that the Draft Plan *"does not share any new analysis that clearly demonstrates why the recommendations are being made, what the outcomes from them would be, or why they are presumed to be effective."* The letter also notes that the Draft Plan would greatly reduce the amount of land open to forest management treatments, resulting in a 30 percent reduction in commercial timber thinning volume on Forest Service lands in the Pacific Northwest. It is important to note that this estimated reduction does not include likely impacts of the Draft Plan to private and state lands and comes on top of the over 80 percent reduction in harvest volumes from federal lands following adoption of the NWFP.

The comments and analysis prepared by the BLM provide an even more troubling glimpse of the effects of the Draft Plan. In its December 15, 2010 memorandum to the FWS, the BLM modeled the effect of key recommendations and actions contained within the Draft Plan and concluded that BLM forests in western Oregon would experience a 50 percent reduction in NWFP harvest levels. BLM's analysis suggests that an already hard hit southwest Oregon timber harvests would be reduced by as much as 90 percent from NWFP harvest levels. At the same time, spotted owl habitat on BLM lands would only increase by 8 percent over the next 30 years and would increase by only 0.1% annually in southwest Oregon. In their comments to the FWS regarding the No Net Loss Criterion, BLM states that "*The scientific or analytical basis for this criterion is not clearly stated.*" The BLM's comments on Recovery Actions 10 and 32 note that "*It is unclear from reading the recovery plan what the anticipated effectiveness of this recovery action would be in meeting recovery goals*" and "*the effectiveness of this recovery action in meeting recovery goals is not clearly stated.*"

As you may know, private landowners within the range of the spotted owl have also raised repeated and significant concerns about the FWS's scientific basis for recommending additional habitat restrictions on private lands in Washington, Oregon and California. These restrictions, if adopted, would further harm the economic and social health of rural communities across the Pacific Northwest. Many scientists have questioned the effectiveness of the additional habitat restrictions being proposed by the FWS in light of the primary threat now facing the spotted owl, the more dominant barred owl. However, the Draft Plan recommends little more than studying the impact of the barred owl through the possible experimental removal of barred owls and instead focuses on placing additional restrictions on federal, state and private lands.

In light of the concerns raised by the public, scientific peer reviews and federal land management agencies, we are requesting that the FWS release a revised Final Draft of Northern Spotted Owl Revised Recovery Plan for an additional transparent, public comment and review process. Since FWS has indicated that it does not need to issue a final recovery plan until June 1, 2011 there is more than sufficient time to release a revised Final Draft of the plan for public comment and review before adopting any final recovery plan.

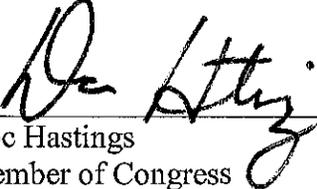
Simultaneously, we are requesting the following information be provided to our offices so we can better understand the rationale for what is being proposed and the potential effects. We are most interested in receiving any empirical or modeling evidence the FWS has to show that additional habitat restrictions on federal and non-federal lands will lead to increased spotted owl populations. This would include:

- Models of spotted owl populations with and without Recovery Actions 10 and 32, estimating effect, if any, on current population declines, including:
 - Separate models with and without the influence of the barred owl;
 - Separate models with and without habitat contribution from private land;
 - Separate models of population trend benefits of Recovery Actions 10 and 32 to display the incremental benefits of each;

- Separate models of population trend benefits from Recovery Actions 10 and 32 with and without the current Late Successional Reserve (LSR) system to display the incremental benefit of the LSR system;
 - Estimated annual budget for a barred owl control program and modeling results on how such a program would affect spotted owl population trends.
- Once the FWS has issued a revised Final Draft, an updated effects analysis by the Forest Service and BLM on the management impacts of implementing the plan, especially Recovery Action 10 and 32.

We remain very concerned with the process that has been employed thus far in the development of the Northern Spotted Owl recovery plan. We hope you will work with us to address these concerns and look forward to your response.

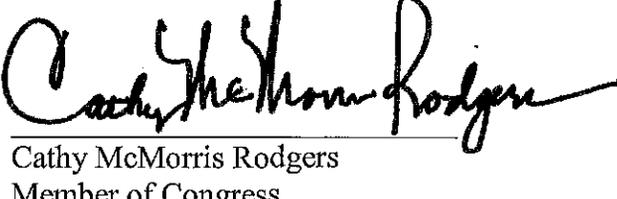
Sincerely,



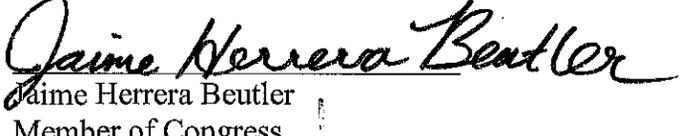
Doc Hastings
Member of Congress



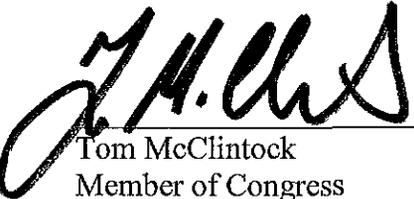
Greg Walden
Member of Congress



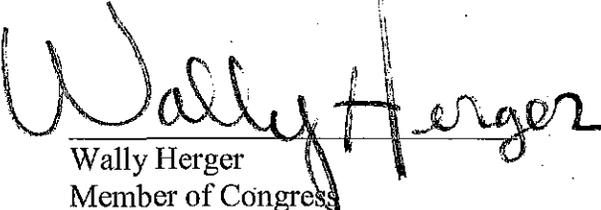
Cathy McMorris Rodgers
Member of Congress



Jaime Herrera Beutler
Member of Congress



Tom McClintock
Member of Congress



Wally Herger
Member of Congress

Cc: Secretary of Agriculture Tom Vilsack