

November 21, 2013

The Honorable Sally Jewell  
Secretary  
U.S. Department of the Interior  
Washington, D.C. 20240

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
Washington, D.C. 20250

Dear Secretary Jewell and Secretary Vilsack,

The undersigned conservation organizations are writing to request the land management and wildlife conservation agencies under your purview implement the guidance of the Northern Spotted Owl Recovery Plan's Recovery Action 12 regarding post-fire logging on federal forests within the range of the Northern Spotted Owl.

Action is needed as a result of legislative proposals, such as H.R. 1526 and S. 1479, that would expedite post-disturbance logging and because of projects being considered by federal agencies that could potentially degrade or eliminate post-fire habitats important to the threatened Northern Spotted Owl and its prey base.

An October 31 letter endorsed by 250 scientists to each of your Departments states that "legislation to expedite post-disturbance logging is inconsistent with the current state of scientific knowledge, and would seriously undermine the ecological integrity of forest ecosystems on federal lands." The scientists' letter is attached for your consideration.

Furthermore, the Final Revised Northern Spotted Owl Recovery Plan includes Recovery Action 12 to promote the development of spotted owl habitat. The U.S. Fish and Wildlife Service determined that in addition to myriad detrimental ecological effects, post-fire logging is harmful to the Northern Spotted Owl which uses burned habitats but less frequently will use burned and logged habitats. The agency also found evidence that post-fire logging and the resulting creation of tree plantations can increase fire risks.

***Recovery Action 12: In lands where management is focused on development of spotted owl habitat, post-fire silvicultural activities should concentrate on conserving and restoring habitat elements that take a long time to develop (e.g., large trees, medium and large snags, downed wood).*** Examples of areas where we believe this recovery action would greatly benefit future spotted owl habitat development include such fire-affected areas as the Biscuit fire, the Davis fire and the B&B complex.

We anticipate many cases where the best approach to retain these features involves few or no management activities. Forests affected by medium- and low-severity fires are still often used by spotted owls and should be managed accordingly (p. III-49, Revised Recovery Plan for the Northern Spotted Owl).

U.S. Fish and Wildlife Service analysis of the Final Northern Spotted Owl Critical Habitat rule identifies the management shifts called for by Recovery Action 12, including the protection of owl habitat in matrix areas and the prohibition of post-fire logging in late-successional reserves:

Under the auspices of the Revised Recovery Plan's Recovery Action 12 recommendation, critical habitat designation could shift post-fire salvage management guidelines in the matrix from extraction of timber resources to "conserving and restoring habitat elements that take a long time to develop (e.g., large trees, medium and large snags, downed wood). Additionally, under the NWFP, Late Successional Reserves (LSRs) provide for salvage logging after fire events greater than ten acres in size that would likely be inconsistent with this recommendation. (Final Northern Spotted Owl Critical Habitat Economic Analysis p. 4-5)

We urge that the U.S. Fish and Wildlife Service strictly enforce Recovery Action 12 during Section 7 consultation, and that Bureau of Land Management and Forest Service plans and projects within the range the Northern Spotted Owl implement Recovery Action 12 to limit post-fire logging in designated critical habitat of the Northern Spotted Owl.

We would be interested in meeting with your staff to discuss this issue further.

Sincerely,

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American Bird Conservancy

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Director of Public Lands Program  
Center for Biological Diversity

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CC: Senator Ron Wyden  
Senator Jeff Merkley  
Senator Dianne Feinstein  
Senator Barbara Boxer  
Senator Patty Murray  
Senator Maria Cantwell