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Title:

Comments: Ms. Lisa Bousfield

U. S. Forest Service Klamath National Forest

Happy Camp/Oak Knoll Ranger District

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Happy Camp, California 96039

Subject: Response to Scoping on the Crawford Vegetation Management Project Dear Ms. Bousfield:

This is in response to your August 4, 2011 scoping letter for the Crawford Vegetation Management Project. In light of the release of the 2011 Northern Spotted Owl (NSO) Recovery Plan (Recovery Plan), we would like to review previous discussions pertaining to Recovery Action (RA) 32 in Unit 242-44. Also, the Yreka Fish and Wildlife Office (YFWO) would like to use this project as an opportunity to initiate a collaborative process for interpreting and implementing RA32. We appreciate your district's proactive approach and the opportunities you have provided for early involvement at the project level.

A field review was conducted on November 16, 2009, with Mr. Tim Burnett, Happy Camp biologist, Ms. Jan Johnson of my staff, and yourself. The intent of visiting Unit 242-44 was to determine if stand conditions met RA32 objectives, as described in the 2008 Recovery Plan. Some time has passed since that field review and the NSO Recovery Plan has undergone revisions and was finalized in June of this year. The 2011 Recovery Plan modified the language for RA32, but the intent for stands containing structurally complex multi-layered conifer forests has remained the same: maintaining and restoring high quality habitat to provide additional support for reducing key threats faced by spotted owls. Language in the Recovery Plan now refers to "stands or patches" that meet the described conditions, and that "... these stands or patches may be relatively small but important in a local area." Also since the field review, we have shared with the Klamath National Forest (KNF) documents from other US Forest Service (USFS) and US Fish and Wildlife Service (Service) offices in USFS Region 6 describing the criteria and processes used to identify RA32 stands.

Ms. Johnson's notes (enclosed) describe Unit 242-44 as consisting of two types of stands. The majority of the unit is an even-aged, primarily Douglas fir single story stand with open understory, no hardwoods or shrubs, and very little if any, structural complexity. The Service recognizes this portion of the unit could be improved by promoting the development of larger trees and creating a more diverse stand. However, a small portion of this unit (about 0.5-1.0 acre), on the western edge, is very different from the rest of the unit as it contains a structurally complex patch of forest with a mix of species and size classes. Ms. Johnson determined that Unit 242-44 as a whole could be used by NSOs but, due to the overall lack of structural diversity and complexity did not meet the intent of RA32, as described by the 2008 Recovery Plan. At the time of the field visit, we did not evaluate the differing stand conditions of the western patch in context of other habitats in the planning area or if it was unique or "important to that local area" as RA32 stands (or 'patches') are currently described in the Recovery Plan.

Given the current Recovery Plan reference to 'patches', we recommend that the district consider the intent of the revised RA32 language and its applicability to the small patch at the western edge of Unit 242-44. Additionally, the district should evaluate this patch's potential uniqueness, its contribution to the surrounding landscape, and its juxtaposition within two known NSO home ranges.

Thank you for your consideration in this matter. We look forward to engaging with KNF supervisors office and district-level resource specialists like yourself at a future Level One meeting, using the Unit 242-44 example to initiate a collaborative process for identifying future potential RA32 stands and patches on the KNF.

For more information regarding this response, please contact Jan Johnson, Fish and Wildlife Biologist, at 530-841-3102 or by email at janjohnson@fws.gov.