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Comments: I am submitting this objection to the Draft Decision Notice and Finding of No Significant Impact for the Little White Salmon project. I regularly visit the Little White Salmon area for wildlife viewing and hiking. I have a direct interest in protecting northern spotted owls and the mature forest habitat that supports the experiences I value in this area.

The project's impacts to northern spotted owls are significant and require an Environmental Impact Statement, not a Finding of No Significant Impact. The US Fish and Wildlife Service determined the project will cause incidental take of spotted owls across 7,301 acres (3,187 acres of habitat harm and 4,114 acres of harassment over the project timeline). The document admits the project will downgrade suitable owl habitat to non-suitable habitat, and this habitat won't recover for up to 20 years. For an endangered species already in steep decline, removing breeding and foraging habitat for two decades is a significant impact that cannot be dismissed with a FONSI.

More troubling, the Draft Decision Notice reveals that "USFWS anticipated additional adverse effects to spotted owls in locations the USFS considered unoccupied". My understand is that this would mean the wildlife experts at Fish and Wildlife found more impacts than the Forest Service identified.

Additionally, the assumption that spotted owls are absent from surveyed areas is scientifically flawed. The Forest Service conducted acoustic surveys for only one year (2023) and concluded that "spotted owls were not considered present in the six surveyed territories where spotted owls were not detected". But failure to detect owls in a single year does not prove that they are absent. Spotted owls have large territories and do not vocalize every year; detection may be limited even with modern equipment. The fact that USFWS found additional impacts in areas the Forest Service considered unoccupied confirms this assumption was wrong. Under the Endangered Species Act, agencies must use a precautionary approach, not assume absence based on limited data.

It is clear that the cumulative impacts analysis for this project is insufficient. The Finding of No Significant Impact dismisses cumulative effects after authorizing 11,308 acres of treatment producing 75 million board feet over 20 years. Spotted owls are already facing barred owl competition, declining prey, habitat loss from past logging, and climate change stress. Adding 7,301 acres of incidental take on top of these existing threats is cumulatively significant. The analysis provides no meaningful quantification of other ongoing and foreseeable timber sales across the Gifford Pinchot or how this project compounds climate change impacts already affecting owls and their habitat.

I would like to request that the Forest Service remedy the issues with this proposal by preparing an Environmental Impact Statement, completing all Survey and Manage surveys before making any decision and withdrawing the amendment that defers surveys. It is also necessary to conduct spotted owl surveys for at least 2 to 3 years and assume presence in suitable habitat where data is inconclusive.

The Forest Service would be wise to also consider reviewing and analyzing reasonable alternatives that were dismissed, such as conducting young plantation thinning only or substantially reducing the number of acres of mature forest thinning. The Forest should establish enforceable standards for protecting spotted owl habitat and mature forest structures, rather than adhering to discretionary project design criteria.

Thank you for your consideration of this objection.