

**Albion River Watershed Protection Association/
Friends of Salmon Creek**
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September 30, 2007

Ken Hoffman
Coastal California Fish and Wildlife Office
Fish and Wildlife Service
1655 Heindon Road
Arcata, California 95521-5582

**Re: Request for Technical Assistance concerning the Northern Spotted Owl for the
Bohemian Grove Non-Industrial Timber Management Plan, 1-06NTMP-011 SON**

Dear Mr. Hoffman:

The Albion River Watershed Protection Association is reviewing the Bohemian Grove timber management plan 1-06NTMP-011 SON ("NTMP 011", "plan"). Our group requests the U.S. Fish and Wildlife Service provide technical assistance regarding the potential for NTMP 011 to result in take of the northern spotted owl (*Strix occidentalis caurina*)(NSO).

Based on review of NSO habitat information provided in the plan, on Department of Fish and Game reports dated 12-01-06, 8-08-06 and 5-24-07, and expert public comment, we believe that take of the NSO may occur through operations on the NTMP as currently proposed.

There are five (5) owl activity centers located within 1.3 miles of the plan's boundaries. Two of these centers are located within the NTMP boundaries.

This is a 2470-acre NTMP that proposes Selection, Group Selection (1576 acres with individual tree selection between groups), Rehabilitation (158 acres), and Variable Retention/Transition (335 acres). Non-timberland totals 27 acres. No acreages are given for Selection, as it will be used only for hazard tree removal in the main grove area. Also, the RPF notes "Transition may be used instead of Variable Retention in some stands."

Six entries, spaced at 20-year intervals, are proposed over the next 100 years.

Yarding will be ground-based and cable (high lead and skyline).

In addition, the plan proposes road and landing construction and reconstruction, winter operations, harvesting tanoaks, treating tanoaks with herbicides, heavy equipment use in WLPZs, and work on numerous erosion control sites under an Erosion Control Plan to meet the North Coast Regional Water Quality Control Board's Categorical Waiver of Waste Discharge Requirements, Order No. R1-2004-0016.

The Department of Fish and Game's Pre-Harvest Inspection Report (dated 12-1-06) makes these statements regarding proposed operations,

"From information presented in the NTMP, significant changes to the NTMP's forest stand structure will likely occur." (Page 7)

“...the end result of the proposed NTMP will be smaller, disjunct patches of more widely spaced large conifer trees. In general, the Section 9 analysis presented in Figure 4 appears to indicate that the NTMP will convert dense and medium dense canopy cover stands of large, maturing conifers (especially Douglas-fir trees), almost immediately following the first harvest entry, into forest stands with fewer trees, of which most will be notably smaller in diameter...” (Page 8)

“As seen through the NTMP’s 100-year harvest stratum analysis, the number of large old trees will decline over time...intact, contiguous stands of larger, (and older) trees will be reduced in size and become highly fragmented with a high perimeter to core area ratio... could have adverse short- and long-term effects on the terrestrial wildlife community...” (Page 9)

The cumulative and long-term effects of the proposed NTMP should be discussed relative to the persistence and long-term viability of northern spotted owl habitat on the NTMP area. (Page 10)

This last statement sums up exactly what it is that our group is asking of the USFWS.

All activities proposed for this NTMP, including but not limited to those listed above, are proposed in perpetuity and have the potential, individually and cumulatively, to adversely affect the northern spotted owl.

We believe that a Technical Assistance letter from the USFWS needs to consider all activities that are under review for an NTMP, not simply those activities that are related to any one harvest entry. Each harvest entry is but one step in the implementation of the long-term management plan. Likewise, each entry depends - in large part - for its claim that significant adverse environmental impacts have been avoided or mitigated to a level of insignificance on the environmental review of the entirety of the NTMP. This review, under lead agency CDF, is a process currently underway for NTMP 011. The USFWS must participate in that current review, adding their technical assistance to the discussion of the cumulative and long-term effects of the NTMP on the northern spotted owl. They must do so before the NTMP is approved. To do otherwise is both to piecemeal and trivialize their own input, and to exclude that input from disclosure to an interested and concerned citizenry.

Sincerely,

Linda Perkins
ARWPA/FOSC

cc: Leslie Markham and Bill Snyder, CDF
Stacy Martinelli and Rick Macedo, DFG