

Pacific Rainforest Wildlife Guardians

North Cascades District -

BOULDER CREEK

Go away! This sale is an intentional take of the Dry Hansen Spotted Owls. Over-logging is destroying this circle for numerous reasons: excessive fragmentation, too many clear-cuts, too little connectivity, micro-climate damage, feeding habitat damage, excessive predation by corvids, continual logging operations in the circle, loss of suitable habitat within the circle to below what is usable by the owls who forage outside of the circle as a result, too much herbicide and toxin contaminated prey that harms or kills fledglings or limits their already too narrow chances for survival.

This sale must be cancelled immediately to avoid a suit under the endangered species act of USF&W and the department as co-conspirator in intentional take without an incidental take permit, a federal crime.

The sale is huge within their circle that is too degraded already. Competition with Wind Creek has stress the Dry-Hansen owls into traveling beyond the circle to feed. This is not possible for fledglings who would starve or be killed by corvids or land predators who would kill them on the ground when they could fly no further. Fledglings lack the ability to gain lift or remain gliding while they are trying to grow into their bulky adult plumage and are too limited to reach adequate forage habitat there.

As with the other circles that have become historic, ODF and private land owners are pursuing the spotted owl to extinction with habitat loss in the North Cascades District. This must stop! I demand that Boulder Creek sale be cancelled immediately!

Sincerely,

M.D.

PACIFIC RAINFOREST WILDLIFE GUARDIANS

PUBLIC COMMENT ON 2010 ANNUAL OPERATIONS PLANS

Marion County -

April 10, 2009

GREEN TWEENER -

Given the fact that there are continual harvest activities in the Drop Off spotted owls circle and that breeding may have been disrupted by human activity and habitat alteration, causing breeding success to be stifled, why don't you give them a break for 3 more years to let the thins already done, Green Wave and Green Sardine, have a chance to develop into better habitat for the.

Sounds of big trucks, bulldozers and chain saws all the time surely is interfering with breeding. It might be music to you, but aggravates everyone else. If the department doesn't stop over-logging the circle like there's no tomorrow, there may not be a tomorrow for this pair or future offspring. The core has too few acres of suitable habitat from over-logging. The prescription may be beneficial eventually, but the interference in the lives of these owls is unacceptable. Back off! Put the sale off for another 3 years and work farther from the core where the guidelines are still legal, please.

"It's OK" to exceed the incidental take guidelines doesn't count without a permit. The continual harvests in their core habitat is harassing them and threatens to pursue them from their circle. Additional pressure from the Sardine Creek Owls feeding and the loss of feeding habitat while Area 2 is thinned and growing back could put the owls over the edge with harassment and pursuit take causing abandonment of their home range.

Please introduce this sale with my recommendations for changes again in 2012 for the 2013 sale AOPs. This would help prevent the risk of extirpation instead of increasing harm.

Sincerely,

M.D.



Oregon

Theodore R. Kulongoski, Governor

Department of Forestry

North Cascade District

22965 North Fork Road

Lyons, OR 97358

503-859-4325

FAX 503-859-2158

<http://www.odf.state.or.us>



"STEWARDSHIP IN FORESTRY"

June 12, 2009

M. D.
Pacific Rainforest Wildlife Guardians

RE: Public Comment on North Cascade District's 2010 Annual Operating Plan

Dear M. D.:

Thank you for your recent comments on the Fiscal Year (FY) 2010 Annual Operations Plan (AOP) for the North Cascade District. This letter is in response to your concerns about the Boulder Creek and the Green Tweener sales.

All proposed operations in our FY 2010 AOP are in compliance with Oregon Department of Forestry's (ODF's) policies and regulations, including the NW Forest Management Plan, which by reference directs that management of State Forest lands be compliant with the federal Endangered Species Act (ESA), the Clean Water Act (CWA), and applicable Oregon Revised Statutes (ORS's) and Administrative Rules (OAR's). Our plans undergo review internally by staff resource specialists, planners, foresters, and managers in an effort to ensure that proposed operations are consistent and in compliance with these policies, and that an appropriate level of conservation and protection is considered and prescribed.

With regards to your comments about Northern Spotted Owls (NSO), the North Cascade District follows the strategies outlined in ODF's Northern Spotted Owl Operational Policies and Procedures (2008).

The Boulder Creek sale was surveyed for Northern Spotted Owls 2005 through 2008 and will be surveyed again in 2009. Since the sale is within 1.2 miles of an activity center, a biological assessment is required and has been prepared by the ODF Northwest Area Wildlife Biologist. This biological assessment has been reviewed by the U.S. Fish and Wildlife Service and Oregon Department of Fish and Wildlife. All have agreed that after harvest of the proposed Boulder Creek sale, suitable habitat acreage for the affected owl circle will satisfy the recommendations of the Incidental Take Guidelines and will provide sufficient habitat to avoid harming spotted owls.

Your comments about the Green Tweener sale were submitted on April 10, 2009. Green Tweener was part of the FY 2009 AOP. The comment period for the FY 2009 AOP was from February 11 to March 26, 2008. Comments must be received during the comment period. The FY 2009 AOP for the North Cascade District has already been approved. For your information, the Final Biological Assessment (BA) for the Green Tweener was completed by an ODF wildlife biologist on October 29, 2008. This Final BA agreed with the conclusions of the Preliminary BA dated September 29, 2006 and stated: "Timber harvest which results in less than 70 acres of the best available suitable spotted owl habitat encompassing the Drop-Off NSO activity center will be avoided. Sufficient suitable spotted owl habitat within 1.2 miles of the Drop-Off NSO activity center will be maintained in accordance with policy standards."

Hopefully I have adequately addressed the concerns you expressed. Please feel free to contact me at 503-859-4325 if you would like to talk more regarding our proposed activities for fiscal year 2010.

Sincerely,

A handwritten signature in cursive script, appearing to read "Russ Lane".

Russ Lane
Assistant District Forester