

# **NORTHERN SPOTTED OWL CRITICAL HABITAT DESIGNATION AND THE NORTHWEST FOREST PLAN**

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## **Importance of Northwest Forest Plan**

- 1) The Northwest Forest Plan (NWFP) is a multispecies conservation plan addressing the habitat requirements of many species associated with old-growth and late-seral forests. Many of these species are of conservation concern and potential candidates for ESA listing.
- 2) The system of late seral forest reserves (LSRs) established by the NWFP should be the foundation of any critical habitat (CH) designation. Based on latest science, (e.g., recent Northern Spotted Owl demographic meta-analyses), owl declines are less severe in lands managed under the guidelines of the NWFP.
- 3) The preferred option in the CH proposal protects fewer acres than the NWFP. Recent meta-analyses (Anthony et al. 2006, Forsman et al. 2011) document a continuing decline in owl populations. It seems indefensible to protect fewer acres in CH than protected by the NWFP if a high likelihood of recovery is the goal.

## **Relationship Between Critical Habitat Designation and the Northwest Forest Plan**

- 1) The relationship between CH and NWFP is briefly discussed in the proposal, but details are lacking. This is an important oversight because the focal point of the NWFP was a set of LSRs (characterized by number, location, size, and matrix requirements) to address conservation of the owl. As such, the LSRs should be the foundation of CH designation for the owl.
  - Overall reserve area, distribution of reserves, and connectivity are emergent landscape properties of the NWFP essential for owl recovery—however, these properties are not
  - The modeling approach used excluded some LSRs currently occupied by owls and is counter to recommendations of the 2011 Recovery Plan to protect "all occupied nesting territories and high quality habitat".
- 2) The NWFP also established a system of riparian reserves that could serve as critical dispersal habitat for juvenile owls. The extent to which riparian reserves were included in the CH designation is unclear.
- 3) The preferred "alternative" (composite 7) in the CH proposal includes less acres (13,966,071 acres) than the NWFP (16,394,548 acres) and may offer less assurance of owl recovery.
- 4) Nowhere in CH proposal is the relationship between the rule, the NWFP, and the recommendation for active forestry management clearly discussed.
- 5) The NWFP is a multi-species conservation plan. However, no analysis is provided in CH proposal as to the effectiveness of the CH network in providing habitat for other late-seral/old-growth associated species of conservation concern.

## **Recommendations:**

- 1) The system of LSRs established in the NWFP should be the initial foundation for CH designation.
- 2) Include all known occupied sites in the CH designation.
- 3) Consider additional multi-species benefits of CH designation for the owl.

## **SCALE MATTERS: Project Impacts and Cumulative Effects Analyses**

- 1) The CH proposal makes a distinction between two scales of impacts on CH: the scale of the entire CH network, and the project scale (>500 acres). The 500-acre scale is the threshold for determinations of “not likely to affect” under section 7 consultations of the ESA.
- 2) The amount of habitat at the core area scale shows the strongest relationships with home range occupancy, survival, and reproduction. Importantly, core areas in some parts of the owl’s range (e.g., Redwood Coast) are <500 acres. Thus, a 500-acre threshold would fail to protect essential core areas in parts of the owl’s range when the USFWS concludes there will be “no adverse effect.”
- 3) Most logging projects on FS and BLM lands occur at scales <500 acres (there is an 80-acre limit on clear-cuts on Forest Service lands in the NWFP region) and would not trigger an evaluation of CH impacts. Given this threshold size, the potential for unknown cumulative impacts is great.
- 4) The potential for significant cumulative effects is great even if 500 acres is much smaller than a typical core area.
  - Effects accumulate temporally if the interval between disturbances are less than the species’ recovery time.
  - Effects accumulate spatially when the spatial proximity between disturbances is smaller than the distance required to disperse these disturbances.
  - Effects do not necessary combine in an additive fashion—they may accumulate multiplicatively resulting in "tipping points."
- 5) Active management projects (e.g., thinning, fuels reduction) should be evaluated in terms of the cumulative effects expected even if < 500 acres.
- 6) Monitoring and cumulative effects analyses are essential components for adaptive management of forest habitat within the range of the owl. **However, the methods for cumulative effects analyses or the monitoring of project impacts are not discussed in the CH proposal.**

## **Recommendations:**

- 1) Eliminate 500-acre threshold for evaluation of potential adverse impacts. Project impacts should be evaluated regardless of size and in the context of previous completed and planned projects.
- 2) Include in final rule a discussion of the process and standards for monitoring the impacts of projects on individual owls and owl populations.
- 3) Provide in final rule details on the process and standards for cumulative effects analyses.