



North Central Washington  
**AUDUBON SOCIETY**

North Central Washington Audubon Society  
P.O. Box 2934  
Wenatchee, WA 98807  
[www.ncwaudubon.org](http://www.ncwaudubon.org)

August 18, 2020

Mary McDonald  
Forest Practices Assistant Division Manager Policy and Services  
Washington Department of Natural Resources  
1111 Washington St. SE  
PO Box 47012  
Olympia, WA 98504-7012

RE: Stakeholder Comment on the North Blewett SOSEA Assessment Process.

North Central Washington (NCW) Audubon would like to provide the following comment and suggestions regarding the assessment of Forest Practices success in supporting northern spotted owl within the North Blewett Spotted Owl Special Emphasis Area (SOSEA).

1. *“Success” as measured by the assessment should include an evaluation of the effectiveness of the Forest Practices rules in meeting the goals for spotted owl population support specified in the rules.*

NCW Audubon is concerned with the definition of “success” proposed for use in the assessment. Agency compliance with the WAC in permitting forest practice applications is proposed as the measure of success. While important, this does not address the much more significant question of effectiveness of the rules in supporting the population of Northern Spotted Owl in Washington. This larger question is the primary reason behind our petitions, their review and discussion by the Forest Practices Board. Concern with the proposed definition of success was also voiced by Dr. Kara Whittaker of the Washington Forest Law Center and Forest Practices Board Member Paula Swedeen during the August 12, 2020 Forest Practices Board meeting.

2. *“Success” should be measured by progress made increasing the amount of suitable habitat within the SOSEA since it currently has less than the minimum number of acres of suitable owl habitat.*

The rules provide a yardstick for measuring success, that is, 2,605 acres of suitable owl habitat within a SOSEA. If indeed this measure is valid, success is easily measured by comparing the current amount of suitable owl habitat within the SOSEA with this minimum considered adequate to support spotted owl

goals. In the absence of a SOSEA-wide plan for attaining adequate amounts of suitable habitat at some time in the future, the assessment should inform how this habitat target will eventually be reached – this would at least show progress toward “success” as defined by the rule. Since timber currently classified as “Non-habitat – Potential for Future Habitat” can be harvested, it appears unclear this measure of success will ever be achieved.

*3. The assessment should include review of forest practice activities permitted through the full 25-year period requested by the Forest Practices Board utilizing GIS records maintained by the Department of Natural Resources.*

Review of only the last 10 year’s forest practices permitting may reduce understanding and value derived from the assessment. Although detailed records of the permitting process may only go back 10 years, DNR maintains a geodatabase for forest practice applications going back to the 1990’s. Although the geodatabase does not include details of the permitting process, it contains information on applications, which may be valuable to the assessment, including activity size, dates and locations for the entire 25-year period originally requested by the Board.

*4. GIS should be used to develop map exhibits showing the extent and distribution of forest practice activities permitted and conducted within the SOSEA during the time period reviewed, to increase understanding of effects on spotted owl habitat.*

No mention is made of any GIS analysis in the outline of the assessment process, yet GIS offers a powerful tool for assessing and understanding the impacts of habitat fragmentation over time from forest practice activities. Where within the SOSEA has harvest been permitted? What activities have occurred within 0.7 miles of the SOSEA center? What is the configuration of currently suitable habitat? Mapping is needed to answer these questions.

*5. The assessment should include review of spotted owl habitat and federal habitat management on federal land within the SOSEA to evaluate its contribution in supporting the goals of owl management within this SOSEA.*

As presented, the proposed assessment process will ignore management of federal lands and habitat within the SOSEA, yet a significant portion of the SOSEA is federally managed. If the assessment is to draw conclusions regarding how effectively Forest Practices rules support NSO in the North Blewett SOSEA it is important to evaluate the role played by federal ownership and habitat management.

We appreciate the opportunity to provide input for the North Blewett Spotted Owl Special Emphasis Area assessment being prepared for the Washington Forest Practices Board.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Thorn". The signature is fluid and cursive, with the first name "Todd" and last name "Thorn" clearly distinguishable.

Todd Thorn

NSO Petition Lead, North Central Washington Audubon Society

CC: Steven Bernath, Forest Practices Board Chair  
Hilary Franz, Commissioner of Public Lands  
Kara Whittaker, Senior Policy Analyst, WA Forest Law Center  
Trina Bayard, Director of Bird Conservation, Audubon Washington  
Art Campbell, President, North Central Washington Audubon Society