

29 January 2018

Mandy Culpeper
California Fish & Wildlife
Sacramento, CA

Re: Northern Spotted Owl (NSO) Stakeholder Forum

Dear Mandy:

My name is Craig Blencowe. I am a consulting forester who has been practicing sustained-yield deletion forestry for almost 40 years. I am also a forest landowner.

I would like to focus on only a single topic relative to the NSO:

The existing NSO protocols are out of date. They are predicated on the premise that a certain size buffer zone must be left around an activity center because it is assumed that the area outside the activity center is devoid of nest/roost habitats (ie. due to previous intensive harvest).

Regulatory agencies need to recognize that on most non-industrial forestlands this is not the case. Landowners who manage their forests via a Non-Industrial Timber Management Plan (NTMP) are mandated to show increasing inventory through time. The only way to do this is to cut less than you grow. By so doing, these owners are actually increasing NSO habitat through time. The fact that barred owls may move into this improved habitat is not the fault of the landowner.

I have harvested some of my client properties four times over a 30-40 year period. Without exception, there is more timber volume present today than when we began the management program. Average tree size has also increased. NSO habitat has improved. Prior to management, I had three 2000-acre properties that were mostly NSO forage habitat. Today, they are all entirely nest/roost habitat. The activity center habitats do not end at 1000 feet; nest/roost habitat is contiguous across the landscape, in some cases, for miles.

It is imperative that the agencies recognize what is actually happening on the ground. They need to reward, not punish, these landowners for their contribution to wildlife habitat. The agencies should provide incentives for landowners who are actually creating habitat.

There are three significant ways that the agencies can demonstrate this recognition:

1. Reduce no-cut buffers down to 300' (per the successful Habitat Retention Agreements (HRAs) previously overseen by the USFWS).
2. Reduce calling protocols on properties where the long-standing owl sites have been consistently documented
3. Establish a comprehensive nest abandonment protocol which might, for example, only require a 100' buffer around old sites.

The outdated existing NSO protocols have also become out-of-hand. They have become the tail wagging the dog. Aside from timber marking, it takes more time and cost to satisfy each year's NSO requirements than it does to prepare and lay out an annual NTMP harvest.

I encourage you to consider the concerns of these landowners whose management encourages NSO habitat creation.

Thank you,

A handwritten signature in black ink, appearing to read 'Craig Blencowe', written in a cursive style.

Craig Blencowe
Registered Professional Forester