



Forest Landowners OF CALIFORNIA

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June 21, 2017

Bruce Bingham, Field Supervisor
U.S. Fish & Wildlife Service
1655 Herndon Road
Arcata, CA 95521

Re: Northern Spotted Owl Technical Assistance Associated with Non-Industrial Timber Management Plans

Dear Mr. Bingham,

Forest Landowners of California (FLC) represents small forest owners in California. Our members are actively managing more than 350,000 acres of private timberland for beneficial uses including timber, water and wildlife habitat.

FLC is disappointed to hear that U.S. Fish & Wildlife Service (USFWS) is planning to discontinue providing technical assistance related to Northern Spotted Owl (NSO) associated with non-industrial timber management plans. This announcement causes formidable challenges for long-term commitments being reached and discourages future efforts for the small forest owners' sustainable forest practices. The small forest owner will be vulnerable to economic loss caused by increased financial liability due to transformation challenges and associated delays caused as result of the announced change. It is entirely unfair that one party can eliminate a service provided when timber management plans were approved, while the other party continues to be obligated to adhere to timber management plan regulation.

Having heard of the USFWS announcement, FLC has some questions to which we would appreciate a written reply.

1. How can the USFWS assure that CalFire or California Department of Fish & Wildlife will provide the same level of technical assistance concerning NSO regulations associated with non-industrial timber management plans?
2. How can the USFWS assure that the impact of this change will not cause substantial economic loss to the small forest owner?
3. How can the small timber landowner be relieved of obligation equivalent to that abandoned by USFWS?
4. How can the USFWS expect the recovery of the NSO if it is going to withdraw from future discussions about the species and its protection?

5. This has been the second time which an agency has abandoned forest landowners in California, what guarantee do you have that CDFW or Cal Fire will be able to budget this responsibility?

FLC requests that the USFWS reconsider the decision to withdraw from the technical assistance process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Valdek Parik". The signature is written in a cursive, flowing style.

Valdek Parik
President, Forest Landowners of California

cc: Congressman Jared Huffman
Congressman Doug LaMalfa
Congressman Mike Thompson
Assemblymember Jim Wood
State Board of Forestry and Fire Protection
Forest Landowners of California Members