



Family Forest Foundation
Committed to the Conservation and Prosperity of Family Forests

July 9 2010

Ken Berg
Supervisor, Western Washington Fish and Wildlife Office
Jim Michaels
Biologist
US Fish and Wildlife Service
510 Desmond Drive SE
Suite 102
Lacey WA 98503

Dear Ken and Jim:

Thank you for the June 7, 2010 letter notifying us of your intent to publish a Notice of Receipt of Application in the Federal Register and invite public comment on the documents included in our permit application. Your letter identified several reasons why you believe the Family Forest Habitat Conservation Plan (FFHCP) and draft Implementation Agreement (IA) "are deficient". We of course strongly disagree with these assertions and have tried over the years to explain and demonstrate why the scientific approach used in the development of the FFHCP is in fact valid.

To date, our efforts to persuade the Services to engage in open and transparent discussions with the scientific community about our methodology have, as your letter clearly demonstrates, been unsuccessful. Nevertheless, we are hopeful that your willingness to allow public review of the proposed HCP will create the opportunity for such discussions.

However, given the history and current status of the negotiations between the Services, the County and the Family Forest Foundation (FFF) regarding the FFHCP, your letter of June 7, 2010 causes us to wonder whether the Federal Register Notice will provide a balanced representation of the scientific methodology upon which the HCP is based. Therefore, we were wondering if it is appropriate for the FFF and the County to have an opportunity to review the draft Federal Register Notice. Or, if it is not appropriate, would we be allowed the opportunity to include our rebuttal of the purported "deficiencies" in the Federal Register Notice.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in cursive script that reads "Thomas R. Fox".

Tom Fox President, Family Forest Foundation

Cc: Will Stelle, Robyn Thorson