



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

FYI



JUN 07 2010

F. Lee Grose, Chairman
Lewis County Board of Commissioners
351 NW North Street
Chehalis, WA 98532-1900

Tom Fox, President
Family Forest Foundation
P.O. Box 1364
Chehalis, WA 98532

Dear Chairman Grose and Mr. Fox:

We are writing in response to your December 22, 2009, correspondence to Michael Bean, Counselor to the Assistant Secretary for Fish, Wildlife and Parks, and to Mr. Steve Stinson's recent visit with Mr. Bean on behalf of the Family Forest Foundation.

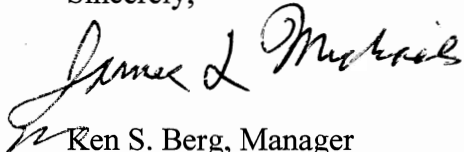
Our June 2, 2009, joint letter with the National Marine Fisheries Service to the Lewis County Board of Commissioners outlined the reasons why we believe the draft Family Forest Habitat Conservation Plan (FFHCP) and the draft Implementation Agreement (IA) are deficient. As stated in that letter, and in numerous discussions, the draft FFHCP does not provide riparian buffers that adequately address large wood and water temperature requirements for the covered species. As described, the riparian buffers are based on a model that is not derived from the currently-accepted scientific approach. Additionally, use of currently-accepted methodology could not duplicate the results suggested in the draft FFHCP. Since the adaptive management program in the draft FFHCP is based on the inadequate buffers, it does not adequately address the biological risks inherent in any riparian management strategy. The draft IA does not address: the potential requirement for mitigation upon early termination of the permit; compliance regime details including enforcement; and the accountability of the County as holder of the permit for failure to perform its obligations.

It is our understanding that you want the Fish and Wildlife Service to make a permit decision based on the draft FFHCP and the draft IA included in your permit application. We will publish a Notice of Receipt of Application in the Federal Register and invite public comment on the documents included in your permit application. The process to publish the Federal Register notice could take up to 60 days.

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If you or Mr. Stinson have any questions or wish to check on the status of the Federal Register notice, please contact me at (360) 753-4065.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ken S. Berg".

Ken S. Berg, Manager
Washington Fish and Wildlife Office

cc:
FWS-ES, Portland (T. Rabot)