



Bringing back the birds

July 7, 2016

Gary Frazer
Assistant Director
Endangered Species Programs
U.S. Fish and Wildlife Service
Washington, D.C. 20240

Dear Assistant Director Frazer,

American Bird Conservancy is interested in continuing the productive dialogue on endangered species issues. Today, we are writing regarding the conservation status of the Northern, California and Mexican subspecies of Spotted Owl. We are concerned about threats facing the owl, and this letter includes recommendations for the Service and other federal agencies to advance its conservation which we would be interested in discussing with you and appropriate Service staff.

The threatened Northern Spotted Owl, proposed for uplisting, is in steep decline, undergoing range contraction, and is at risk of extinction across its range. The California Spotted Owl is also in decline and is being considered for Endangered Species Act protection. The population status and trend of the threatened Mexican Spotted Owl is currently unknown.

Each subspecies continues to be threatened by habitat loss on federal lands from logging, most notably post-fire logging for Northern and California, and excessive thinning for all three. Recent studies indicate that forest management activities are driving down California owl populations, and intensive mechanical thinning and post-fire logging in the Sierra Nevada National Forests are reasons that that subspecies should now be listed. We urge that this research be considered for the Northern Spotted Owl as well.

We also note that in recent years there have been federal policy, planning and project decisions that will negatively affect the Northern Spotted Owl, including the critical habitat rule, the BLM's FEIS and PRMP for western Oregon, and the Westside logging project on the Klamath National Forest. We believe these kinds of policies, plans and projects harmful to the owl need to be quickly reversed to begin stabilizing and recovering its population as recent studies and monitoring reports call for increased habitat protections in combination with experimental removal of Barred Owls within the range of the Northern Spotted Owl.

At a March meeting, we were pleased when Northern Spotted Owl lead for the Service Paul Henson indicated that the agency was moving towards a policy of no take for the owl, pending the establishment of an expanded Barred Owl control program. The BLM FEIS in Oregon is proposing a 5-8 year moratorium on owl take. We support the idea of a moratorium and recommend that it last for

30 years based on anticipated habitat restoration under the Northwest Forest Plan, and that lifting it not be predicated on Barred Owl control but instead be based on achieving recovery thresholds.

The California Spotted Owl has also faced repeated conservation setbacks. These include the 2006 decision to not list the subspecies, harmful changes to the Sierra Nevada Framework that encourage logging of owl habitat, and a lack of adaptive management in the face of evidence that logging on federal lands is driving the California Spotted Owl towards extinction. We recommend that it be listed.

Commendably, the Forest Service is now undertaking a regional conservation strategy to conserve the California Spotted Owl, but we are concerned that its recommendations are planned to only be advisory. This will not ensure adequate conservation across the range and this strategy should be reconsidered in favor of a binding decision document incorporated into forest plan revisions. We are interested in playing an active role, similar to our work on the Greater Sage-Grouse regional plans, to help advance an effective range-wide conservation strategy.

We appreciate that for the Mexican Spotted Owl, a monitoring project is being undertaken by the Forest Service to assess its population trend. Results from Bird Conservancy of the Rockies is expected in several years, however, it will not produce a range-wide population estimate. We urge additional research to determine the total population size.

Thank you for considering these recommendations. We look forward to working with the Service to conserve and recover the Spotted Owl. I can be contacted at 202 888 7490 or sholmer@abcbirds.org to arrange a meeting at your convenience for further discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Holmer", written in a cursive style.

Steve Holmer
Senior Policy Advisor
American Bird Conservancy