

11 January 2010

Paul Henson
Field Supervisor
Oregon Fish and Wildlife Office
2600 SE 98th Ave, Suite 100
Portland, OR 97266

Dear Paul:

The Wildlife Society and the Society for Conservation Biology are taking this opportunity to submit comments in response to the Notice of Intent to Prepare an Environmental Impact Statement Related to Experimental Removal of Barred Owls for the Conservation Benefit of Threatened Northern Spotted Owls.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 9,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve wildlife professionals—the scientists, technicians, and practitioners actively working to study, manage, and conserve native and desired non-native wildlife and their habitats worldwide.

The Society for Conservation Biology is an international professional organization dedicated to promoting the scientific study of the phenomena that affect the maintenance, loss, and restoration of biological diversity. The Society's membership comprises a wide range of people interested in the conservation and study of biological diversity: resource managers, educators, government and private conservation workers, and students make up the more than 10,000 members worldwide.

Barred owls present a potentially significant threat to spotted owls. The 2008 Final Recovery Plan for northern spotted owls focuses on experiments to remove and control barred owls in specific areas as a way to determine the extent to which they compete with spotted owls. This is appropriate at this time before any landscape level controls are considered. Therefore, The Wildlife Society (TWS) and the Society for Conservation Biology (SCB) support careful experimental removals of barred owls given the declining status of the threatened northern spotted owl and the need to reduce all stressors contributing to the decline of the species. Such experimental removals would serve as a much-needed addition to the research on spotted owls. However, we stress that FWS must not lose sight of the primary reasons the spotted owl was listed in the first place – destruction of its old forest habitat and inadequacy of regulatory mechanisms.

Barred owl removal should not be used as a substitute for habitat protection. While the Notice of Intent correctly noted that securing habitat alone may not result in recovery of the spotted owl, continued habitat destruction will most certainly magnify the threat from the current barred owl invasion by increasing competitive interactions as populations of both species are packed into smaller and smaller areas of suitable habitat. This also has likely reduced the efficacy of the late-successional reserve network, particularly as federal lands with most of the remaining suitable

spotted owl habitat are surrounded by intensively managed landscapes lacking the structural elements necessary to support viable spotted owl populations. FWS should not lose sight of these interactions, as was noted in extensive peer reviews conducted by leading owl scientists, TWS, SCB, and the American Ornithologists' Union of the draft (2007) and final (2008) owl recovery plan. Thus, all alternatives should examine the combination of multiple threats to spotted owls – not just barred owls.

We also stress that the barred owl removal must be done as rigorous scientific research and conducted as humanely as possible. Finally, spotted owl populations of course must be monitored to determine the impact of barred owl removal.

In closing, we support FWS' emphasis on the use of best available science in barred owl removal experiments. We would stress, however, that northern spotted owl populations continue to decline across their range and any attempts to control barred owl populations for the benefit of spotted owls should be combined with habitat protection measures. Only through addressing the multiple threats to spotted owl recovery will these actions be successful. Although outside the scope of this action, the FWS should also ensure that the revised recovery plan for spotted owls appropriately recognizes the importance of increased habitat protections in recovering the species as emphasized in the extensive peer reviews on the 2007 and 2008 versions of the plan, submitted by these two Societies as well as the American Ornithologists' Union.

Thank you for considering the views of conservation professionals.

Sincerely,



Bruce Leopold, Ph.D.
President, The Wildlife Society



Dominick A. DellaSala, Ph.D.
President, North America Section,
Society for Conservation Biology