

October 2, 2007

Secretary Dirk Kempthorne
1849 C Street, NW
Washington, DC 20240

RE: Northern Spotted Owl Draft Recovery Plan

Dear Secretary Kempthorne:

The northern spotted owl is one of the most intensively studied endangered raptors in the world. Decades of scientific research and the largest mark-recapture population studies ever conducted on a threatened species have provided valuable insights into the owls' habitat requirements, prey base, and demographic characteristics¹. As scientists with backgrounds in population ecology, wildlife and endangered species management, natural resource management and forest ecosystems, we are greatly concerned that, according to scientific peer review recently conducted by owl experts and three of the nation's leading scientific societies, much of this science was ignored in the published draft recovery plan for the northern spotted owl². Based on these reviews, and the alleged political interference documented in a May 9 hearing on the Endangered Species Act in the House Natural Resources Committee,³ we respectfully request that you withdraw the draft owl recovery plan and assemble a team of scientists to redraft a recovery plan truly based on the best available science.

The spotted owl is an indicator species of the status of old-growth forests in the Pacific Northwest, which historically included up to two-thirds of the forest age classes in the region but now represent just under 20 percent⁴. In particular, the Northwest Forest Plan (NWFP) is a landmark ecosystem management plan that put in place a reserve system for the owl and hundreds of species associated with older forests throughout the region. Recent scientific assessments have concluded that there is no reason to depart from a conservation strategy rooted in fixed reserves and the spotted owl situation would be far bleaker today if not for the protections afforded to it under the NWFP⁵. While there has

¹ Anthony, R.G., E.D. Forsman, A.B. Franklin, D.R. Anderson, K.P. Burnham, G.C. White, C.J. Schwarz, J. Nichols, J.E. Hines, G.S. Olson, S.H. Ackers, S.L. Andrews, B.L. Biswell, P.C. Carlson, L.V. Diller, K.M. Dugger, K.E. Fehring, T.L. Fleming, R.P. Gerhardt, S.A. Gremel, R.J. Gutierrez, P.J. Happe, D.R. Herter, J.M. Higley, R.B. Horn, L.L. Irwin, P.J. Loschl, J.A. Reid, and S.G. Sovern. 2006. Status and trends in demography of northern spotted owls, 1985-2003. *Wildlife Monographs* No. 163:1-47.

² www.conbio.org/Sections/NAmerica/SCBA%20Comments%20to%20FWS%20Northern%20Spotted%20Owl.pdf; <http://www.wildlife.org/policy/index.cfm>
<http://www.fws.gov/pacific/ecoservices/angered/recovery/peer.html>

³ DellaSala, Dominick. Written testimony for the House Natural Resources Committee Hearing entitled "Endangered Species Act Implementation: Science or Politics?"
<http://www.nccsp.org/files/land/spottedowltestimonydds.pdf> Additional information available at <http://www.nccsp.org/>

⁴ Strittholt, J.R., D.A. DellaSala, and H. Jiang. 2006. Status of mature and old-growth forests in the Pacific Northwest, USA. *Conservation Biology* 20:363-374.

⁵ Courtney, S.P., J.A. Blakesley, R.E. Bigley, M.L. Cody, J.P. Dumbacher, R.L. Fleischer, A.B. Franklin, J.F., R.J. Gutierrez, J.M. Marzluff, and L. Sztukowski (eds). 2004. Scientific evaluation of the status of the

been ground-breaking research on owl habitat relations⁶ that has expanded our understanding of owl habitat use, there is no scientific basis for departing from the reserve network of the NWFP or any reason to conclude that old-growth forests are no longer essential to the owl's survival. And though barred owls have emerged as a growing threat to spotted owls, the science is far from conclusive regarding how this biological invasion will affect the survival and recovery of the northern spotted owl.

Based on our understanding of the ecology of the spotted owl, we see no scientific basis for either reducing habitat protections for the owl – as currently proposed under Option 1 of the recovery plan– or departing from a conservation strategy that is rooted in the fixed reserves of the NWFP such as Option 2⁷. Rather, increased threats from barred owls and potential climate change effects justify protecting more habitat – not less – as a precautionary principle in the conservation and recovery of listed species that is clearly missing from the draft recovery plan.

In closing, we understand that you have recently commissioned a review of eight Endangered Species Act decisions influenced by former Assistant Deputy Secretary Julie MacDonald as part of reforms underway to improve the Fish & Wildlife Service's track record on Endangered Species Act decision making. We request that you include in these department reviews the draft spotted owl recovery plan for three reasons: (1) the science may have been tampered with by high ranking officials; (2) the plan is not based on credible science as indicated by scientific peer review; and (3) the plan is a key decision document that could determine the fate of millions of acres of old-growth forests in the Pacific Northwest.

Fish & Wildlife Service policy requires recovery plans to be based on the best available science in order to recover a species to the point where it no longer requires protections afforded under the Endangered Species Act. We are concerned that because this recovery plan would remove from protection old-growth forest habitat at a time when threats are increasing and owl population declines are accelerating that it could lead to future up-listing of the species to endangered status. For these reasons, we request that you commission a team of scientists to redraft the recovery plan and place related forest management policies on hold until a new draft is proposed.

Northern Spotted Owl. Sustainable Ecosystems Institute, Portland, OR. Lint, J. 2005. Status and trends of Northern Spotted Owls populations and habitat. USDA PNW-GTR-648. DellaSala, D. A., and J. Williams. 2006. Northwest Forest Plan Ten Years Later – how far have we come and where are we going. *Conservation Biology* 20:274-276.

⁶ Franklin, A.B., D.R. Anderson, R.J. Gutierrez, and K.P. Burnham. 2000. Climate, habitat quality, and fitness in Northern Spotted Owl populations in northwestern California. *Ecological Monographs* 70:539-590. Dugger, K.M., F. Wagner, R.G. Anthony, and G.S. Olson. 2005. The relationship between habitat characteristics and demographic performance of Northern Spotted Owls in Southern Oregon. *The Condor* 107:863-878. Olson, G.S., and several others. 2004. Modeling demographic performance of Northern Spotted Owls relative to forest habitat in Oregon. *J. Wildlife Management* 68:1039-1063.

⁷ Carroll, C., and D.S. Johnson. In review. The importance of being spatial and reserved: assessing habitat relationships and conservation options for the northern spotted owl with Bayesian spatial autoregressive models.

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