

Bird Conservation Alliance

**Working Together to Conserve
America's Wild Birds**



December 15, 2010

Field Supervisor
U.S. Fish and Wildlife Service
Oregon Fish and Wildlife Office
2600 SE. 98th Avenue, Ste. 100
Portland, OR 97266

Dear Sir/Madam:

On behalf of the undersigned conservation organizations please accept these comments regarding the draft Northern Spotted Owl Recovery Plan. We commend the Service for providing additional protected habitat for the threatened Northern Spotted Owl in this proposed draft, as well as the planned experimental removal of Barred Owls and recognizing the need to provide additional habitat protection to enable Barred Owls and Spotted Owls to potentially coexist.

However a number of deficiencies identified in peer reviews by the scientific societies that reviewed the original plan have yet to be adequately addressed in the areas of active management and fire. Of particular concern are recommendations for extensive thinning treatments without empirical studies on the effects of these treatments on Spotted Owls or their prey. Further, estimates of owl habitat loss from fire are not based on defensible data sources and we are concerned that the Service has not adequately addressed post-fire logging, which may be an even greater threat to owls than fire.

We are concerned the draft plan fails to be built upon the protections of the Northwest Forest Plan as a baseline for recovery. The late-successional reserves in this plan provide the best basis for moving legally and scientifically defensible management decisions forward. We are opposed to an owl recovery plan that would enable land management agencies to undo or ignore the requirements of the NWFP, or to eliminate reserves.

Because the Spotted Owl population continues to decline, a recovery plan should require immediate relief from land management activities resulting in owl take, as well as provide additional habitat protection on federal lands, and more effective incentives for the species' conservation on private lands than is currently being proposed. Specifically, we recommend that the agency:

- Protect all suitable habitat (and not just high quality) as a precautionary measure, and to address our concern that the draft plan states that Recovery Action 32, that conserves Spotted Owl habitat outside of the late-successional reserves, may only be temporary.

- Adopt a more precautionary approach to active management proposals. Thinning and forest management prescriptions to benefit the Northern Spotted Owl proposed by the recovery plan should be conducted as monitored experiments on a small scale until risks and benefits to owl populations can be demonstrated.
- Initiate public involvement and science review of the Dry Forest Working Group recommendations to better ensure their input is based on the best science.
- Review currently proposed projects in Northern California and halt activities that result in incidental take or adverse modification of owl habitat.
- Extend Recovery Action 17 that requires the identification and development of specific protections to owl sites in Washington State to all non-federal lands. Oregon lags behind Washington and California in state forest practices and needs this additional conservation measure.

Thank you for considering these comments. We look forward to working with the agency to addressing these issues and bringing about the recovery of the Northern Spotted Owl.

Sincerely,

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