

**Allegheny Defense Project * American Lands Alliance * Audubon Society of Portland *
Bark * Buckeye Forest Council * California Wilderness Coalition *
Center for Biological Diversity * Coast Range Association *
Environmental Protection Information Center * Forests Forever * Friends of Blackwater *
Green Mountain Forest Watch * Heartwood * Hells Canyon Preservation Council *
Kittitas Audubon Society * Klamath Forest Alliance * Northcoast Environmental Center *
Olympic Forest Coalition * Oregon Wild * Religious Campaign for Forest Conservation *
Sierra Forest Legacy * Siskiyou Project * Umpqua Watersheds, Inc. * Wild South *
The Wilderness Society * Wilderness Watch * WildWest Institute *
World Stewardship Institute**

August 23, 2007

Paul Phifer
U.S. Fish & Wildlife Service: Region 1
Eastside Federal Complex, 911 N.E. 11th Ave.
Portland, OR 97232-4181

RE: Northern Spotted Owl Draft Recovery Plan

Dear Mr. Phifer:

On behalf of our hundreds of thousands of members across the country, the undersigned organizations thank you for the opportunity to review and provide comments on the draft recovery plan for the federally threatened Northern Spotted Owl. We are opposed to the draft recovery plan: it is not based on the best available science and should be withdrawn to allow for a new recovery team to reissue a credible plan that will ensure that federal land management actions contribute to the recovery of the owl.

The draft recovery plan for the Northern Spotted Owl is fundamentally flawed in that it is not based on the best available science. This is due, in large part, to the inappropriate influence of the "Washington Oversight Committee," comprised of high-level political appointees. Contrary to assertions from the Fish and Wildlife Service that the plan was based on "new science," the draft recovery plan contains numerous scientific flaws that render the habitat provisions inconsistent with the best available science. Both options 1 and 2 in the Draft Recovery Plan call for reducing suitable old growth forest habitat for the owl, which the owl and many other old growth associated species need to survive.

Among these flaws are:

1) Efforts on the part of the Washington Oversight Committee to de-emphasize past science that demonstrated the dependence of spotted owl species health and viability on old growth forests. Both options reflect this influence.

2) The misinterpretation and misapplication of two studies in the owl's southern range (Franklin et al. 2000, Olson et al. 2004). Both recovery options use the studies mentioned above as "new science" to support the flawed theory that Northern Spotted Owls are not dependent on large areas of old growth habitat for their survival. However, in letters to the recovery team, the authors of both studies cautioned the group not to extrapolate the findings of the studies of the owl's southern range to any other location, as the findings of the studies are too preliminary.

3) Neither Option 1 nor Option 2 provides adequate levels of habitat for the spotted owl.

4) Both options place the eradication of barred owls as a priority - above protecting old growth critical habitat - to ensure the spotted owl's recovery. While the barred owl appears to be a threat to the spotted owl, the last thing a species under stress needs is a reduction in the habitat it needs to survive. The protection of old growth habitat must take precedence in order to ensure the spotted owl's survival.

In addition, efforts to "delink" the Northwest Forest Plan (NWFP) from the recovery of the spotted owl are wholly ill-advised. The NWFP, covering western Oregon, Washington, and northwestern California, has served as the de-facto owl recovery plan for over a decade. The plan has set aside large blocks of old growth reserves and should be the baseline for comparisons of recovery plan alternatives. Also, the recovery plan must be linked to the NWFP because it is more consistent with the provisions of the Endangered Species Act (ESA) regarding conserving the ecosystems upon which spotted owls depend. In the five-year status review of the owl, Courtney and Franklin (2004) concluded that there was no scientific reason to depart from the NWFP and the situation would be much bleaker today for the owl without the plan.

We are also troubled by the involvement of the Washington Oversight Committee in the drafting process. This oversight committee comprised of Forest Service and Fish and Wildlife officials, including Julie MacDonald, the former Deputy Assistant Secretary for Fish, Wildlife and Parks at the Department of Interior, and Mark Rey, Undersecretary of Agriculture who oversees the Forest Service, directed the recovery team to develop Option 2 so that it could better meet the timber demands of the Forest Service and Bureau of Land Management (BLM). In our view, this inappropriate influence by the action agencies compromises the fundamental responsibilities and mission of the Fish and Wildlife Service, which is to ensure that adequate habitat for wildlife, and especially listed species, is sufficiently safeguarded. Timber demands or land use planning needs of federal agencies should not be a principal concern of the recovery plan as the ESA is clear on this point – recovery plans need to be based on the best available science not the demands of specific agencies.

Based on the issues explained above, we believe that neither Option 1 nor Option 2 of the recovery plan are based on the best available science and will likely result in the need for future up-listing of the owl to endangered status due to a lack of habitat protections. Also, the drafting process has been unacceptably tainted by high level political interference. We respectfully request that you convene a new recovery team, consisting of, among others, independent owl scientists, and rewrite the recovery plan.

Thank you for considering our concerns in this review of the draft owl recovery plan and we look forward to your response.

Sincerely,

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