

June 6, 2012

Mr. Paul Henson
Field Supervisor
U.S. Fish & Wildlife Service, Oregon Fish & Wildlife Office
2600 SE 98th Ave. Ste. 100
Portland, OR 97266

Sent by email:

Dear Mr. Henson,

On behalf of the Olympic Peninsula Audubon Society (OPAS) we appreciate this opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) regarding the *Experimental Removal of Barred Owls to Benefit Threatened Northern Spotted Owls*.

Olympic Peninsula Audubon provides birding and conservation of habitats through education programs, citizen science, and stewardship. The recovery of the spotted owl remains a high priority for our membership, but lethal control of barred owls continues to be a controversial issue which warrants a high level of assurance that the Service will endeavor to address the original reasons for the spotted owl decline and adequate protections are assured.

After careful examination of the DEIS, OPAS has taken the position to support a controlled, experimental, removal of the barred owl in order to prevent the extinction of the spotted owl. Our decision is based on scientific data that indicates that direct competition from an influx of the more aggressive barred owls into the Pacific Northwest has created a nesting decline which makes spotted owl recovery potentially impossible.

We support continued, full protection of barred owls under the Federal Migratory Bird Treaty Act of 1918, but are willing to concede to experimental removal only for the specific purpose of determining whether long-term lethal control of barred owls is warranted and practical. If the Service determines the experimental removal of barred owls is successful, it is important that all management strategies proposed in the DEIS are determined economically feasible.

We believe the most important aspect of the recovery of the spotted owl continues to be adequate habitat protection of remaining old growth forests. The proposed Revised Critical Habitat Rule for the Northern Spotted Owl could potentially weaken the protections currently provided by the Northwest Forest Plan. We plan to submit more comprehensive comments on the Revised Critical Habitat Rule by July 6th, 2012.

Thank you for your consideration of our comments.

Mary Porter-Solberg
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Sequim, Washington

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