

April 3, 2009

The Honorable Ken Salazar  
Secretary of the Interior  
Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

**Re:** Request for Immediate Withdrawal of Final Recovery Plan and Revised Critical Habitat for Northern Spotted Owl

Dear Secretary Salazar:

As scientific societies concerned with recovery of endangered species or the peer review of the Northern Spotted Owl Recovery Plan (signed May 13, 2008) and Critical Habitat Determination (73 Fed. Reg. 47,326 Aug. 13, 2008), we appreciate your March 31, 2009 announcement that the government is interested in reconsidering both decisions. We now urge you to withdraw these flawed decisions because, as noted in scientific peer reviews, they are not scientifically credible and are likely to reduce the likelihood of survival and recovery of the threatened Northern Spotted Owl at a time when population declines are accelerating.

The scientific critiques of the Recovery Plan for the Northern Spotted Owl have been clear and severe. The three scientific societies that signed this letter -- The Wildlife Society, the Society for Conservation Biology, and the American Ornithologists' Union -- first reviewed the Draft Northern Spotted Owl Recovery Plan in early 2007. All three societies' reviews, in addition to three separate peer reviews by leading owl scientists that were requested by the Fish and Wildlife Service, found that the Draft Recovery Plan misrepresented scientific studies and posed high risks to owl recovery. Many of us wrote your predecessor, Secretary Kempthorne, urging him to "*withdraw the draft owl recovery plan and assemble a team of scientists to redraft a recovery plan truly based on the best available science.*"<sup>1</sup> This advice was not heeded.

Specialists in avian population dynamics, spotted owl ecology, forest ecology and management, fire ecology, and other relevant fields who are members of our societies found that the Final Recovery Plan for the Northern Spotted Owl also was not based on the best available science and will likely exacerbate the owls' threatened status<sup>2</sup>. As the Society for Conservation Biology and American Ornithologists' Union aptly noted,

*"the Final Plan is still inadequate as a conservation strategy, falling short in both its interpretation of science and application of those interpretations to guide management."*

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<sup>1</sup> 112 Scientist Letter Re: Northern Spotted Owl Draft Recovery Plan (Oct. 2, 2007; <http://www.nccsp.org/files/Scientist%20letter%20re%20Owl%20Recovery%20Plan.pdf>).

<sup>2</sup> The Wildlife Society Review (July 31, 2008; [http://joomla.wildlife.org/documents/NSO\\_final\\_plan.pdf](http://joomla.wildlife.org/documents/NSO_final_plan.pdf)); The Society of Conservation Biology/American Ornithologists' Union Review (June 27, 2008; <http://www.conbio.org/activities/policy/docs/SCB-AOU%20Review%20-%20Northern%20Spotted%20Owl%20Final%20Recovery%20Plan.pdf>).

Similarly, The Wildlife Society stated,

*“the plan would reverse much of the progress made over the past 20 years to protect this species and the habitat upon which it depends.”*

The independent scientists who reviewed the Final Recovery Plan called on the Fish and Wildlife Service to withdraw the plan and undertake further revisions in order to, at a minimum, make the recovery plan consistent with the Northwest Forest Plan. However, an analysis by The Wildlife Society<sup>2</sup> of the recovery plan’s assumptions regarding fire argued that the plan overstated the threat of fire to owls and inappropriately proposed a non-reserve strategy for dry forest provinces that is inconsistent with the Northwest Forest Plan. Further, in August 2008, the Fish and Wildlife Service relied on the flawed Final Recovery Plan to justify reducing protection for Northern Spotted Owl critical habitat by almost 1.6 million acres relative to the 1992 determination. According to a recent paper by Carroll and Johnson (2008)<sup>3</sup>, this reduction in critical habitat could trigger up to a 38% reduction in abundance of already threatened owls across their range.

As noted in the December 2008 report issued by the Office of Inspector General<sup>4</sup>, many decisions by the Fish and Wildlife Service over the past eight years were not based on sound science or public accountability. With your decision to reconsider the owl recovery plan and critical habitat determination, you have made the laudable commitment to usher in a new era of ethical responsibility and scientific integrity in the Department. Accordingly, we now call on you to withdraw the Northern Spotted Owl Recovery Plan and Revision to Owl Critical Habitat and restart the process with recognized owl scientists and other relevant scientists assigned the task of completing new plans based on the best science.

Sincerely,

Edward M. Burt, Ph. D.  
President  
American Ornithologists' Union

Michael Hutchins  
Executive Director/CEO  
The Wildlife Society

Ellen Paul  
Executive Director  
Ornithological Council

Erica Fleishman, Ph. D.  
North American Section President  
Society for Conservation Biology

cc: Will Shafroth, Assistant Secretary for Fish, Wildlife and Parks  
Brian Arroyo, Assistant Director, FWS, Endangered Species  
Senator Ron Wyden, Reps. Peter DeFazio, Jay Inslee, Nick Rahall

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<sup>3</sup> Carroll, Carlos, and D.S. Johnson. 2008. The Importance of Being Spatial (and Reserved): Assessing Northern Spotted Owl Habitat Relationships with Hierarchical Bayesian Models. *Conservation Biology* 22: 1026.

<sup>4</sup> Inspector General’s Report (Dec. 10, 2008), available at [http://wyden.senate.gov/newsroom/interior\\_ig\\_report.pdf](http://wyden.senate.gov/newsroom/interior_ig_report.pdf).