

March 17, 2025

On behalf of the Environmental Protection Information Center and the Klamath Forest Alliance, please accept these comments on the draft amendment to the Northwest Forest Plan. These comments concern the Forest Service's obligations towards promoting the recovery of the northern spotted owl.<sup>1</sup>

Our organizations appreciate the goals outlined in the draft amendments to “[c]onsult and engage with affected Tribes in the implementation of any barred owl management strategies,”<sup>2</sup> “develop an approach to manage barred owls” and to “promote the long-term recovery of the northern spotted owl.”<sup>3</sup> Furthermore, we appreciate that many of the existing goals, objectives, standards and guidelines in the 1994 Plan concerning spotted owls were retained in amendments. We are concerned, however, that increased forest management contemplated by Alternatives B and D, together with other stressors like barred owl invasion, are sufficient to jeopardize the continued existence of the species. Therefore, we request pursuant to 16 U.S.C. § 1604(g)(3)(B), implemented through 36 C.F.R. 219.9(b), that additional species-specific plan components be developed.

**Additional or Amended Forest-Wide Goals:**

FORST-ALL-GOAL-01: Work with relevant federal and state agencies and other partners to implement the U.S. Fish and Wildlife Service Barred Owl Management Strategy (2024) within 12 to 18 months after a Record of Decision is signed. If the Barred Owl Management Strategy is revoked, invalidated or otherwise not in effect, conduct barred owl removal at a pace and scale necessary to promote the recovery of the northern spotted owl.

FORST-ALL-GOAL-02: Work with U.S. Fish and Wildlife Service, other federal agencies, Tribes, state, and private partners to promote long-term recovery of the northern spotted owl across its historic range.

FORST-ALL-GOAL-03: Work with Tribes and partners such as academia, NGOs, forest collaboratives, private forest landowners, and community groups on monitoring impacts from barred owl invasion on species diversity and ecosystem health.

**Additional Forest-Wide Objectives:**

FORSTW-ALL-OBJ-02: Annually conduct barred owl removal consistent with the Barred Owl Management Strategy (2024) or other barred owl management strategy.

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<sup>1</sup> 16 U.S.C. § 1604(g)(3)(B); 16 U.S.C. § 1531(c)(1).

<sup>2</sup> DEIS at A1-2.

<sup>3</sup> DEIS at A1-15.

1. Within 5 years, remove all barred owls from all Priority A and Priority B spotted owl nest sites.
2. Within 10 years, remove barred owls from all Priority A and Priority B General Management Areas and Priority C and D spotted owl nest sites.
3. Within 15 years, remove barred owls from all Priority C, D, and E General Management Areas, and Special Management Areas

FORSTW-ALL-OBJ-03: Within five years, in cooperation with Tribal, state and other federal agencies, the Forest Service shall examine the feasibility of a captive breeding and release program for northern spotted owls for areas where extant populations may no longer be viable.

FORSTW-ALL-OBJ-04: The Forest Service will implement the 2011 Northern Spotted Owl Recovery Plan or subsequently published Recovery Plans issued by the U.S. Fish and Wildlife Service pursuant to 16 U.S.C. § 1533(f).

FORSTW-ALL-OBJ-05: Within 12 months, all National Forests will complete a Barred Owl Management Plan that details how the forest unit will complete barred owl removal consistent with the USFWS Barred Owl Management Strategy.

**Additional Forest-Wide Standards:**

FORST-ALL-STD-01: The Forest Service may not take any northern spotted owl as part of commercial timber activities. Other management activities that result in take of individual owls must promote the long-term recovery of the species.