



November 17, 2015

**Audubon California
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**Public Comments Processing
Attn: FWS-R8-ES-2015-0139
U.S. Fish and Wildlife Service, MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803**

Comments on the petition to list the California Spotted Owl as endangered or threatened under the federal Endangered Species Act of 1973, as amended.

On behalf of Audubon California and Plumas Audubon Society's members and supporters, we provide the following information in response to the U.S. Fish and Wildlife Service's (USFWS) 90-day findings on the petition to list the California Spotted Owl (*Strix occidentalis occidentalis*) as endangered or threatened under the federal Endangered Species Act of 1973, as amended, which found that the petitioned action may be warranted based on Factors A, D, and E. We support the listing of the California Spotted Owl under the ESA for the reasons outlined below.

We view the recovery of, and at a minimum preventing extinction of, the Spotted Owl (*Strix occidentalis*), including all subspecies, as a conservation priority, and that the petitioned action is warranted. The petition demonstrates that more than 20 years of demographic monitoring has concluded that there has been a range-wide, long-term decline of the California Spotted Owl population, including declines in abundance, territory occupancy, recruitment, and of breeding pairs on forest-service managed lands (Franklin et al. 2004, Seamans 2005, Seamans and Gutierrez 2007, Blakesley et al. 2010, Conner et al. 2013, Tempel and Gutiérrez 2013, Tempel 2014, Tempel et al. 2014a, b).

The California Spotted Owl demographic study areas showed declining owl populations, and these areas had not been hit by high severity wildfire, which can have strong negative effect on owl habitat. One potential cumulative effect of climate change on Spotted Owls is an increase in high-severity wildfire: there have been four mega-fires on the Plumas National Forest in the northern Sierra Nevada since 2000, burning over 200,000 acres (Stephens et al. 2014). These fires burned predominantly in mixed-conifer forests, encompassing more than 60 California Spotted Owl Protected Activity Centers (PACs, Stephens et al. 2014). Cumulatively, 34% of the area burned in these fires suffered more than 95% dominant tree mortality (Miller et al. 2009).

The Plumas Audubon Society (PAS) is conducting California Spotted Owl surveys on the Plumas National Forest and has seen first-hand how one of these mega-fires, the Moonlight Fire of 2007, has destroyed mature forests. Surveys conducted by PAS in 2015 found Spotted Owls on only 2 territories in a 13,500-acre survey area that included the remaining patches of potentially suitable owl habitat in the area burned by the 65,000-acre Moonlight Fire (PAS 2015).

Thinning activities aimed at reducing fuel loads to mitigate future potential fire activity, including Defensible Fuel Profile Zones (DFPZs) and select cuts on the Plumas National Forest, have been shown to cause declines in Spotted Owls (Seamans and Gutiérrez 2007; Gallagher 2010, Stephens et al. 2014; Tempel et al. 2014a). Despite the potential negative effects, forest managers are thinning within Spotted Owl PACs to reduce the chance of losing these mature forests to stand-replacing fires (USDA Forest Service 2014).

Audubon California attended the recent Barred-Spotted Owl Symposium at The Western Section of the Wildlife Society annual meeting on January 26, 2015. The science clearly indicated that control of Barred Owls (*Strix varia*) has become necessary to prevent extinction of the Northern Spotted Owl (*Strix occidentalis caurina*) (Diller 2015). Barred Owls now occur throughout the Sierra Nevada including recent records from the Chico, Reno, and Los Angeles areas (Wiens 2015). In 2009, the Plumas-Lassen Administrative Study (PLAS) reported that there were 53 Barred Owl records across the Sierra Nevada, 39 in the PLAS area alone (USDA Forest Service 2010). We do not know how many Barred Owls currently occur within the range of the California Spotted Owl, but it is certainly more than have been detected on Spotted Owl surveys. In a comparative study in California, Barred Owls responded less than Spotted Owls to calls from their own species and both species responded more frequently to calls of their own species than to other *Strix* species (Carlson 2015). We are not aware of any Barred Owl surveys that have been conducted or are planned in the Sierra Nevada.

An additional threat to the existence of the California Spotted Owl is the increasing problem of poisoning by anticoagulant rodenticides (Higley 2015). Anticoagulant rodenticides are becoming a significant threat to wildlife in rural areas, due in part to illegal marijuana cultivation as well as use in households and cabins (McDonald 2015). Recent research on the Hoopa Reservation in northwest California found that 78 out of 155 Spotted Owls tested were positive for anticoagulant rodenticides (Higley 2015).

Based on the best available scientific evidence that we have reviewed, and on our first-hand experience with this species, we believe that the following is necessary to ensure survival of the California Spotted Owl:

- Continue to provide protection and restoration of Spotted Owl habitat (mature/old growth forest);
- Continue rigorous monitoring and data collection to ensure scientifically defensive and strategic decisions;
- Provide public outreach and education as part of an integral component of recovery efforts;
- Apply what has been learned with the Northern Spotted Owl to implement conservation efforts earlier for the California Spotted Owl;

- Commence Barred Owl surveys immediately in the Sierra Nevada;
- Initiate research on the impact of anticoagulant rodenticides to avoid potential confounding conclusions of research investigating other impacts.

Please feel free to contact us with any questions regarding this information.

Sincerely,



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