

From: [REDACTED]
To: [FGC](#)
Subject: Please list the Northern Spotted Owl as "endangered" under the California ESA
Date: Friday, September 19, 2014 7:59:54 PM

I am writing to request that you vote to approve listing the Northern Spotted Owl as an "endangered" species under the California Endangered Species Act (CESA). Your commitment to upholding the public trust and protecting native wildlife is true and it therefore follows that you should advance the petition submitted by the Environmental Protection Information Center to list the Northern Spotted Owl under CESA.

The Northern Spotted Owl has been listed under the federal Endangered Species Act (ESA) as "threatened" since 1990. Despite more than 20 years of protections, the Northern Spotted Owl is now closer to extinction than ever. Recently, spotted owl biologists have published a comprehensive analysis that determined the species has been declining on seven of eleven active demographic study areas at about 3% annually range-wide from 1985-2008, and that the decline is accelerating in recent years (Forsman et al. 2011). The rate of decline is steepest in northern Oregon and Washington, where spotted owl populations would decline by more than half in the next 20 years. On the remaining federal lands, population decline is accelerating and vital rates are deteriorating. On non-federal lands, including areas that once provided some of the highest quality habitat for spotted owls in California, declines are significantly greater than on federal lands, with vast areas no longer supporting any spotted owls at all. Furthermore, it has been recently discovered that Northern Spotted Owls are dying from rat poison that is being used to kill pests on illegal marijuana farms. The outlook for the species is dire based on the population trends, continued habitat loss, competition by the aggressive, invading barred owl, poisoning and the inadequacy of regulatory mechanisms, especially the lack of recovery efforts on state and private lands.

The State of California has never acted to protect the Northern Spotted Owl under CESA. This is despite clear declines throughout the species range in California, as well as the remainder of the range. After listing the owl under the federal ESA, the U.S. Fish and Wildlife Service and federal land managers developed a strategy, the "Northwest Forest Plan," to recover the spotted owl by heavily relying on a selection of federal lands to shoulder the burden of conservation. The plan's centerpiece was a network of habitat islands for spotted owls, termed "late-successional reserves." Unfortunately, the reliance on the Northwest Forest Plan meant that the conservation needs for spotted owls outside of federal reserves was largely ignored. This was especially true on state and private lands where spotted owls have been largely extirpated, with the remaining individuals in dire need of protections. The heavy reliance on fragmented reserves on federal lands without a comprehensive approach to spotted owl conservation on non-federal lands has proven to be a critical error, and one of the primary reasons why recovery has failed. Coupled with continued habitat loss is the very significant threat posed by the barred owl, which displaces spotted owls and thrives in the highly fragmented and simplified industrial forest landscapes.

It is now time for the State of California's Fish and Game Commission to recognize its duties under CESA, and based on the overwhelming evidence, act swiftly to protect the Northern Spotted Owl. Without CESA protections, and more holistic view of species recovery and landscape-scale conservation that includes private and state owned lands, the spotted owl is likely to go extinct in the foreseeable future.

Brittany Harmon
[REDACTED]