



HILARY S. FRANZ  
COMMISSIONER OF PUBLIC LANDS

June 18, 2024

The Honorable Deb Haaland  
Department of the Interior  
1849 C Street, N.W.  
Washington, D.C 20240

Dear Secretary Haaland:

As the 16<sup>th</sup> elected Washington State Commissioner of Public Lands, overseeing the management of three million acres of land across our extraordinary state, I write to you with questions and concerns about the plan to kill nearly half a million barred owls over the next three decades.

While I understand the intention of the federal government to take bold action to save the Northern spotted owl—a species listed as “threatened” under the federal Endangered Species Act—I am concerned this plan does not fully consider the unintended consequences and could be unworkable given the scale of the overlapping habitat for barred owls and spotted owls.

I’m writing to request a briefing with members of your staff to further discuss this proposal and better understand issues that have been raised by land managers and stakeholders.

As proposed, the plan would enable U.S. Fish and Wildlife Service (USFWS) to annually kill upwards of 15,000 barred owls a year for three decades; this would constitute the largest-ever raptor-killing plan conducted.

I recognize that studies demonstrate barred owls are competing with spotted owls and even driving them from their established homes ranges. But concurrence with that analysis of interspecies competition, and a recognition of adverse effects on spotted owls, does not necessarily support extreme solutions to the problem, such as the proposed long-term plan.

Further, if the killing of barred owls can be accomplished without collateral effects on other owl species, including spotted owls, it is not clear how the proposed plan would prevent surviving barred owls within Washington or British Columbia from recolonizing nesting sites. Competition from these newly arrived owls may persist.

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My staff and I manage three million acres of lands, and we work diligently to protect state-listed and federally-listed threatened and endangered species. I have a deep understanding of large-scale challenges, and the need to take bold, decisive action when faced with complex challenges.

However, I also understand the need for careful consideration of the unintended consequences that might impact the ecosystem at large. USFWS is proposing a control program over 14 million acres, with much of it non-contiguous. There is no precedent for a successful wildlife-control program of this scale.

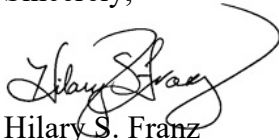
While USFWS did not attach a cost for the plan, conservative estimates from outside sources put the cost estimate at \$235,000,000 over the 30-year time horizon. In the world of threatened and endangered species management plans and recovery efforts, that is a vast sum. That kind of expense inevitably means that other endangered species programs will be impacted. Given finite resources, I do not believe we can look at this problem in isolation.

Barred owls, like other species, are adapting to human effects on their environment. We are all challenged by this in land management, as the human footprint deepens and expands. But a decision to target one species to safeguard another species is inherently fraught. Especially given that barred owls are protected under the Migratory Bird Treaty Act.

I hope that USFWS can make investments in habitat protection for spotted owls and undertake other activities to enhance their chances of survival. But I remain concerned about the proposal to kill barred owls over this length of time and at this scale.

In light of the above, I would welcome the opportunity to meet with your team to discuss the range of consequences, both intended and unintended, and better understand the range of alternate options to help the threatened Northern spotted owl.

Sincerely,



Hilary S. Franz

Commissioner of Public Lands