

November 25, 2024

Golden Gate National Recreation Area Superintendent David Smith
201 Fort Mason
San Francisco, CA 94123

Via email: david_smith@nps.gov

Dear Superintendent Smith,

We write to urge you to exercise your authority as the Superintendent of the Golden Gate National Recreation Area to opt out of the U.S. Fish and Wildlife Service's reckless plan to unleash volunteer "hunters" to implement a plan of mass, sustained killing of barred owls across millions of acres of forested habitats in Pacific Coast states, including within the exceptional NPS unit you oversee. The mass killing of wildlife in our system of NPS units is antithetical to their very purpose of preserving, protecting, and restoring the areas' natural, scenic, and cultural value. We ask you, as superintendent of this American gem, to stand against an action from a sister agency that will allow poorly trained and armed, private mercenaries to invade our national parks and to take aim at owls protected for a century under the provisions of the Migratory Bird Treaty Act.

Barred owls are native to North America, where their historic range covered about half of the United States. They have proved adaptive in dealing with a range of human impacts, including climate change and impacts on grassland and forest ecosystems. We should not victimize range-expanding native species because they adapt to human perturbations of the environment.

Range expansion is a naturally occurring ecological phenomena, and it is a core characteristic of many species of birds and mammals. Indeed, it is the process by which so many species have come to occupy their current ranges. Just like there is no end to history, there is no end to species movements. Kent Livezey, a former U.S. Fish and Wildlife Service biologist working on owl programs, wrote a peer-reviewed paper that noted that at least 112 species he looked at are engaging in range expansion, with 14 of them dispersing more widely than barred owls.

Most nocturnal owls have never been "hunnable" species in the United States, and there is no bank of practical experience in conducting such a control program. The degree of difficulty in successfully executing such a plan is compounded because of the sheer size of the control area. The area is 24 million acres, inclusive of 17 national forests (including millions of acres of designated "wilderness" that are roadless areas), 14 units of the NPS, and a patchwork of other private and state and federal lands.

The plan to unleash hunters to kill hundreds of thousands of barred owls would result in mistaken identity kills of a number of owl species, including spotted owls. Forest owls are nocturnal and live dozens of feet above the forest floor and in dense evergreen forests. Accessing

these animals with volunteer labor and asking people unfamiliar with shooting owls to do this work is a prescription for failure and incidental killing.

Forests in the Pacific Northwest are not well-suited for this kind of hunting. Typically, bird hunting occurs with flushing of upland game birds or shooting waterfowl over marshlands, pothole and lake ecosystems, or over coastal marshes, bays, or oceans. It is a major practical challenge to conduct “hunts” for nocturnal birds of prey in heavily forested vertical ecosystems (there are 19 owl species native to North America, including the barred owl). The disturbance alone would have adverse effects on a wide range of species, along with the direct killing of so many species. Night hunting of the animals is even more impractical, and would pose hazards for the shooters, especially in treacherous terrain.

Millions of Americans do not come to national parks to contend with hunters. Their wildlife-watching experience, which are a key motivator of their visitation motivations, are diminished when wild animals endure sustained human hunting and firearms discharge. Shooting and off-trail intrusions into the forests makes wildlife more skittish and cause them to more readily flee at the sight of humans.

It is the timber industry that financed the “studies” and field work that are the impetus for this plan, as an attempt to distract from the industry’s own continued destruction of spotted owl habitats. In fact, the Department of Interior and the U.S. Fish and Wildlife Service in 2021 stripped protections for the northern spotted owl from 3.4 million acres of federal forestlands. While the Biden administration reversed this significant slashing of protected lands, the new rulemaking still left 200,000 acres of old growth spotted owl habitat open to logging interests. The more forests are logged, with young forest types allowing for colonization by barred owls, the more intense the competitive pressure for space between related owl species.

USFWS had previously killed 2,485 barred owls in five areas of Pacific Northwest forest over five years. The results, published in 2021, show short-term reduction of barred owls, but the spotted owl population did not substantially increase. Any immediate, post-shooting effects that benefit spotted owls will be vitiated by recolonization of surviving barred owls, unless there is sustained and intense levels of hunting of in-migrating barred owls. Attempting to scale up the program over a vastly larger landscape, over decades, is doomed to failure. Golden Gate National Recreation Area should not be part of this folly.

The USFWS’s Final EIS suffers from several defects which make it suspectable to a legal challenge. For example, as part of its “reasonable alternatives” analysis, FWS was required to take a “hard look” at alternatives to the approach it ultimately decided to take. Instead, FWS unreasonably and summarily rejected several alternatives that did not involve the mass killing of barred owls – options like nonlethal barred owl population control, species relocation, and spotted owl breeding programs. The plan does not rest on a sound science-based foundation; there is little technical support for the agency’s decision that the killing of 470,000 barred owls will achieve its goal of saving the spotted owl.

We urge you to announce that Golden Gate National Recreation Area will not participate in this program. It is at odds with the values of the NPS and it will conflict with the use of the park by

visitors. Any fair assessment of the plan leads an informed person to conclude it is doomed to fail.

Sincerely,



Wayne Pacelle
President
Center for a Humane Economy



Scott Edwards
General Counsel
Animal Wellness Action