

December 16, 2025

The Honorable Lisa Murkowski
Chair, Subcommittee on Interior, Environment, and Related Agencies
Committee on Appropriations
United States Senate
Washington, DC 20510

The Honorable Jeff Merkley
Ranking Member, Subcommittee on Interior, Environment, and Related Agencies
Committee on Appropriations
United States Senate
Washington, DC 20510

Dear Chairwoman Murkowski and Ranking Member Merkley:

We are both former chief scientists at the National Park Service (NPS), with a wide range of wildlife management field experience and professional responsibility to oversee more than 400 individual units controlled by the agency, including national parks, monuments, preserves, recreation areas, seashores, lakeshores, battlefields, historical sites, and other designated areas. During our decades of work across a rich set of landscapes and ecological systems inhabited by thousands of species of wildlife, we've executed plans to address wildlife conflicts and made tough choices during our long service for the federal government. But never have we reviewed a more poorly justified wildlife control plan than the U.S. Fish and Wildlife Service's "Barred Owl Management Strategy" and its succeeding interagency "Record of Decision" (ROD).

We urge you to work to bar the Fish and Wildlife Service (FWS) and other federal land management agencies from spending money on this program through the annual Interior, Environment, and Related Agencies' legislation. The plan calls for the shooting of hundreds of thousands of Barred Owls across a vast set of lands, including 14 NPS units, over a 30-year period, committing the agency and the Congress to fund this program at least through the year 2055.

Perhaps most relevant for you, given your primary roles as custodians of taxpayer dollars for the work of the Interior Department, the plan is unworkable. It simply cannot succeed given the vast physical geography of the 24-million-acre control area spanning three states, the absence of any barriers to owl entry to critical habitats for Northern Spotted Owls to lands designated as critical habitats, and the behavioral response of barred owls to colonize forests uninhabited by other others of their kind. Second, we urge you to consider the adverse precedent of allowing the killing of native North American, range-expanding Barred Owls in 14 units of the NPS. Given your triage work in applying federal dollars to a dizzying number of conservation imperatives, you can find better, more productive ways to spend hundreds of millions of dollars.

According to the ROD (required under the National Environmental Policy Act), the following parks and monuments are slated for Barred Owl killing: Olympic National Park, Mount Rainier National Park, North Cascades National Park, Crater Lake National Park, Oregon Caves National Monument, Redwood National and State Parks, Whiskeytown National Recreation Area, Muir Woods National Monument, Golden Gate National Recreation Area, Point Reyes National Seashore, Lassen Volcanic National Park, Sequoia & Kings Canyon National Parks, Yosemite National Park, and Devil's Postpile National Monument. We'll note that the Interior Department has yet to list the California Spotted owl as threatened or endangered, undercutting an ESA-based rationale for the control program in NPS units inhabited by those owls.

Since 1918, national parks and national monuments have traditionally provided refuge for all species of native wildlife. Opening these national park units—some are among the most visited and beloved in our nation—to organized owl shooting violates the essence of the NPS mission to “conserve unimpaired the natural and cultural resources” under its care.

Northern Spotted Owls are threatened largely due to timber harvesting of old growth forests in California and the Northwest that are the core of their habitat preferences. The Barred Owl is also a native North American species but one that has extended its range from the East and Midwest to the Northwest because of restored connectivity of forest habitat across the North American continent. As longtime FWS biologist Kent Livezey documented in a 2010 peer-reviewed paper, “As of 2010, 111 bird species in North America had recently expanded their breeding ranges into at least one new state or province, and 14 species had expanded their ranges into more states or provinces than did barred owls.”

Range expansion in general is a well-documented process and may be accelerated by changes in atmospheric and geophysical or human-caused changes or disturbances. The term invasive is usually applied to aggressive non-native plants like kudzu in the East, cheatgrass in the West, or animals like the Burmese python in the Everglades and feral hogs throughout much of the U.S. now.

While the Barred Owl is being labeled as “invasive” in the west and northwest largely because it competes favorably for habitat with the Northern Spotted Owl and the California Spotted Owl, we can find no credible scientific evidence that this lethal program, as designed and implemented, will have anything but a fleeting favorable effect for Spotted Owls. In a project of this size and scope there will be incidental taking of Spotted Owls through shooting and habitat disturbance (Spotted Owls are shy and reclusive.) Barred Owl reproduction and juvenile dispersal will negate any short-term reduction in their numbers. Range replacement will resume rapidly after initial shooting projects conclude.

This unprecedented and deeply troubling course of action was first identified as a need in the FWS's Northern Spotted Owl Recovery Plan in 2011 and formally proposed during the Biden administration. This action is apparently supported by the Trump Administration and now by the timber industry. That support may be opportunistic given the possibility of gaining increased

access to old growth forest on public lands, particularly the O&C Lands in Oregon. In theory and under ESA legal standards, further loss of Spotted Owls from increased logging of old growth forests may be judged as mitigated by shooting of Barred Owls eliminated from competition with the Spotted Owl under this federally-funded project. Contrary to the promotion of the project as contributing to the recovery of Spotted Owls, it's entirely possible that it may wind up detrimental to both Barred and Spotted Owls. Numerous professional wildlife biologists have pointed out that this Strategy will not achieve the intended conservation outcomes.

In judging the underlying rationale for this Management Strategy, we should consider both the intent of the ESA and its requirement for feasibility in addressing legitimate concerns for a Threatened species. For many the ethical burden from killing 450,000 Barred Owls long protected under the Migratory Bird Treaty Act would, in and of itself, deem this proposal unacceptable and unfeasible.

This Strategy should also be unsupportable from a funding perspective. Significant personnel costs accrue from managing hunter access and ensuring visitor safety in the front and back country of national parks, for example. These and other costs for contracting, data collection, and lab analyses come at a time when national park staffs and budgets are severely cut. The Strategy's documented cost of nearly \$3000 per dead Barred Owl would seem the stuff of government waste parody.

Our national parks and public lands should not be testing grounds for quixotic lethal control programs of native species. To have professional hunters pursuing and killing Barred Owls in national parks will be, we trust, unacceptable to the American public. If that is true this Management Strategy must be withdrawn.

We believe a better, cheaper, more humane approach would be protection of whole ecosystems including more of the remaining old growth forests that Spotted Owls prefer. At the same time enhancing the ability of scientists to study and closely monitor Spotted Owl and Barred Owl population dynamics would undoubtedly lead to a far better approach.

Sincerely,

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