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ECONOMY

March 25, 2024

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

Dear Madame Secretary,

On behalf of the 75 below-listed wildlife protection and animal welfare organizations, we urge you to put aside the U.S. Fish and Wildlife Service's reckless plan to unleash "hunters" to implement a plan of mass, sustained killing of barred owls across millions of acres of forested habitats in Pacific Coast states. We object, specifically, to the USFWS plan detailed in a [Proposed Action](#) that would allow for the killing of nearly a [half million barred owls](#) in the American Northwest over the next three decades as an attempt to protect spotted owls from interspecies competition. The practical elements of the plan are unworkable, and its adverse collateral effects would ripple throughout these forest habitats.

Most nocturnal owls have never been "hunnable" species in the United States, and there is no bank of practical experience in conducting such an immense and complicated control program, seeking to achieve such an enormous body count for a species living in such low densities across millions of acres of federal lands. Implementing a decades-long plan to unleash untold numbers of "hunters" in sensitive forest ecosystems is a case of single-species myopia regarding wildlife control. It betrays a willful failure to anticipate the wide range of adverse consequences such a plan will invariably unspool. This plan will cause severe disruptions to wildlife from the forest floor to its canopies, producing an untold number of mistaken-identity kills of other native owl species (including spotted owls), disrupting nesting behavior for animals, poisoning wildlife from dispersed and fragmented lead, and causing rapid dispersal and social chaos among many other species inhabiting these forest ecosystems.

**Victimizing a native species engaging in range expansion because of climate disturbance.**

Barred owls are native to North America, where their historic range covers nearly half of the United States. They have proved adaptive in dealing with long-running climate impacts and other human impacts and have engaged in adaptive range expansion. We cannot victimize animals for adapting to human perturbations of the environment, perhaps especially when it comes to the all-encompassing effects of climate change. Climate change will trigger all sorts of species movements, and we cannot responsibly judge which species have strayed too much from the confines of their current range. Range expansion is a naturally occurring ecological phenomenon, a core behavioral characteristic of many species of birds and mammals. Indeed, it is the process that led to current species distribution patterns. Just like there is no end to history, there is no end to species movements.

### **Mistaken identity kills off more than a dozen other owl species.**

The plan to unleash hunters to kill hundreds of thousands of barred owls would result in mistaken identity kills of spotted owls and individuals from other owl species, generally nocturnal and live dozens of feet above the forest floor in dense evergreen forests. This is not the habitat for hunting; typically, bird hunting occurs with the flushing of upland game birds or shooting waterfowl in flight over marshlands, potholes, lakes, or coastal marshes, bays, or oceans. Even with a clean look at the species, mistaken identity kills are common among duck hunters. It is practically impossible to conduct “hunts” for nocturnal birds of prey in heavily forested vertical ecosystems who are not in flight (there are 19 owl species native to North America, including the barred owl). The disturbance created by the shooting alone would have adverse effects on a wide range of species, along with the direct, incidental killing that would inevitably result. Night hunting of the animals is unimaginable and even more impractical. This is a case of the federal wildlife agency not seeing the forest from the trees.

### **Lead dispersal will kill thousands of eagles, hawks, owls, and other wildlife.**

While the USFWS has the authority to mandate the use of non-toxic ammunition, this is an agency that recognizes the threats of lead poisoning but has repeatedly refused to act to remediate its detrimental and wide-ranging effects across its own national wildlife refuge system. In October 2023, the U.S. Fish and Wildlife Service (USFWS) published a [final rule](#) relating to hunting in wildlife refuges and concluded that lead is an unmistakable threat to wildlife and to hunting families and friends relying on wild game, noting that “lead ammunition, including bonded lead ammunition, fragments when it hits an animal, and this distributes tiny pieces of lead within a wide radius in the soft tissues of the harvested animal.” Despite the agency’s recognition that lead kills – an inescapable conclusion given that 500 studies documenting the adverse effects on eagles, mourning doves, and other wildlife and also on families consuming game meat -- the agency took extremely limited protective action on national wildlife refuges: it is phasing out the use of lead ammunition over three years on just 8 of more than 400+ refuges where hunting occurs – or just two percent of lands.

### **The barred owl killing plan cannot be scaled to work and doomed to fail.**

The timber industry financed the “studies” and fieldwork that are the impetus for this owl-killing plan as an attempt to distract from the industry’s continued destruction of spotted owl habitats. While the Biden Administration reversed a portion of the decision, the Trump Administration in early 2021 attempted to allow logging on up to 3.4 million acres of mature forests. It seems far easier, as a political matter, to authorize the mass killing of barred owls than to provide enduring and consistent protections of key habitats for the animals where there is a major political and economic influencer pushing for an expansion of logging opportunities.

USFWS had previously killed 2,485 barred owls in five areas of Pacific Northwest forest over five years. The results, [published in 2021](#), show a short-term reduction of barred owls, with only modest numerical gains for spotted owls. Conducting such a program over a vastly larger landscape over decades will simply be impractical and subject to reversals by succeeding administrations. The USFWS simply does not have the personnel to monitor this kind of mass

lethal removal program; in the end, the so-called cure may be worse than the disease itself. Should it be implemented, it may cost hundreds of millions of dollars when the agency is shortchanging plans for protecting dozens of other threatened and endangered species where those expenditures would provide definite protections.

**Government has a long and mixed history of controlling species for conservation aims.**

The federal government was unable to control nutria, a species introduced to North America for fur farming, even after state and federal agencies unleashed government and private trappers and hunters to kill them at will. The federal government, through the U.S. Department of Agriculture, has engaged in a decades-long massive plan to kill coyotes – annually taking 100,000 or so of the ecologically beneficial animals. In spite of this sustained assault, coyotes have dramatically expanded their range and colonized parts of the United States that they haven't lived in for more than a century. The Service's primary control actions have been on islands and other isolated ecosystems, and that's not the set up proposed in the Pacific Northwest for a migratory birds species.

The plan to kill barred owls is a colossally reckless action, almost unprecedented in the history of American wildlife management. It should be sidelined with all deliberate speed, and non-lethal management actions to protect spotted owls and their habitats should be made the priority actions of the USFWS.

Sincerely,

Wayne Pacelle, President  
Animal Wellness Action

Scott Edwards, General Counsel  
Center for a Humane Economy

Alaqua Animal Refuge & Wildlife Rehabilitation Center (Freeport, FL), Animal Behavior and Healing (Portland, ME), Animal Care Society (Mathews, VA), Animal Protection Affiliates (NV), Animal Rights Initiative, Animal Rights Maine, Animal Welfare Society (Kennebunk, ME), Animal Wellness Action, Animal Wellness Foundation, Animals' Angels, Arkansas Valley Audubon Society (Pueblo, CO), Bleating Hearts Sanctuary (Golden, CO), Cedar Cove Conservation & Education Center (Louisburg, KS), Christian Animal Rights Association, Coalition to Protect America's National Parks, Colorado Voters for Animals, Dania Beach Monkey Sanctuary (FL), Evergreen Audubon (CO), Federation of Humane Organizations of West Virginia, Forever Home Beagle Rescue (Pittsburgh, PA), Francisco J. Santiago-Ávila, PhD, MPP/MEM, Interdisciplinary scientist (Madison, WI), Georgia Animal Rights and Protection, Global Federation of Animal Sanctuaries, Good Karma Pet Rescue (Pompano Beach, FL), Greene County Humane Society (OH), Greg Costello, Conservation Policy Consultant (Seattle, WA), Heartwood Haven (Roy, WA), Hope Haven Farm Sanctuary (Sewickley, PA), Hotchkiss Humane Society (CT), Howling for Wolves (Hopkins, MN), Humane Action Pennsylvania, Humane Action Pittsburgh, Humane Society of Huron Valley (MI), Humane Voters of Washington, In Defense of Animals, Jefferson County Humane Society (OH), Lancaster Farm Sanctuary (PA), Last Chance Audubon Society (Helena, MT), League of Humane Voters - Georgia, Maine Animal Coalition, Maine Friends of Animals, Marley's Mutts (Tehachapi, CA), Misfits Coven Animal Haven (Pittsburgh, PA), New Hampshire Animal Rights League, Northeast Equine Rescue (West Newbury, ME), NYCLASS, Ohio Bird Sanctuary, Palm Springs Animal Shelter (CA), Pawsitive Beginnings, Inc. (Key Largo, FL), Peace Ridge Sanctuary (Brooks, ME),

Pittie Posse Rescue (ME), Pittsburgh Vegan Society, Pollination Project, Project Animal Freedom (Eureka, MO), Protect Our Wildlife Vermont, Resource Renewal Institute, Revolution Philadelphia, Sanctuary Education Advisory Specialists, Santa Paula Animal Rescue Center (CA), Social Compassion in Legislation (CA), SPCA International, SPCA of Hancock County (Trenton, ME), Stahl's No Harm Farm Animal Sanctuary (Uniontown, OH), Switch 4 Good, The Center for a Humane Economy, The Conservation Agency (Jamestown, RI), Their Turn, Vegan Pittsburgh, Voices of Wildlife in New Hampshire, Voters for Animal Rights (NY), West Virginia Voters for Animal Welfare, and WildAid.