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July 23, 2025

Dear Representative,

On behalf of the undersigned organizations, please accept this letter in support of the U.S. Fish and Wildlife Service's Barred Owl Management Strategy. The Strategy is a necessary conservation action to stop the extinction of the northern spotted owl and to protect other native species impacted by the barred owl's invasion. We ask that you support the Strategy, or alternatively, not take actions that would be hostile to implementation of the Strategy.

We urge you to oppose the use of a Congressional Review Act Resolution to rescind The Strategy. Using the Congressional Review Act to rescind any Fish and Wildlife Service management plan or strategy could have disastrous consequences. The Congressional Review Act is a blunt instrument with potentially far reaching impacts that should be repealed, and it is particularly dangerous when used on complex natural resource and wildlife agency issues. Upon enactment of a Congressional Review Act resolution, the underlying agency action becomes void and the relevant agency is prevented from future issuance of an action that is "substantially the same" without a further act of Congress. For wildlife management, use of the Congressional Review Act could limit future plans and actions that the Fish and Wildlife Service may take, even if science and the law necessitate those actions. Simply put, a vote to approve a Congressional Review Act resolution for management of wildlife, especially an endangered species like the northern spotted owl, could hinder future efforts to protect the species.

The Strategy provides direction to barred owl removal efforts currently undertaken by federal, state, and tribal governments, together with private entities, so that these removals are coordinated and effective in producing positive ecosystem outcomes. The Strategy does not mandate removal but offers easier permitting, as compliance with the Strategy allows for entities to rely on the Migratory Bird Treaty Act permit. Furthermore, barred owl removal is required action in many Habitat Conservation Plans and is required by the Bureau of Land Management for its operations in Western Oregon.

Barred owls are not native to the West Coast of North America (Livezey 2009a). Settlement of the Great Plains facilitated the expansion of their range by creating more forested habitat (Livezey 2009b). As West Coast ecosystems did not co-evolve with the barred owl, this recent invasion has caused considerable disruption best demonstrated by the northern spotted owl. The barred owl is larger and more aggressive than the northern spotted owl, and where their ranges overlap, the barred owl outcompetes the northern spotted owl, driving the species towards extinction (Franklin et al. 2021). While impacts to northern spotted owls are the most well-documented, other species, such as western screech owls, are also being impacted by barred owls (Acker 2012) and scientists worry that barred owl invasion can have destabilizing effects on entire ecosystems (Holm et al. 2016; Baumbusch 2023). Thankfully, **research has shown that barred owl removal is effective, feasible, and humane.**

Where employed, **barred owl removal has effectively stemmed the decline of northern spotted owls** (Wiens et al. 2021). With barred owl removal, the northern spotted owl is expected to persist across large areas of its range and offers the possibility of species recovery; without barred owl removal, extinction of the northern spotted owl is virtually assured and is likely to occur within the next 50 years (Yackulic et al. 2019).

Contrary to numbers generated by Animal Wellness Action, **barred owl removal is financially feasible and technically achievable.** Implementation of the Strategy is expected to cost between \$4.5-12m/year, with costs likely to decrease in the future as initial removal efforts will be more costly as the initial population of barred owls to be removed is higher (Dumbacher and Franklin 2024). Past removal experiments have likewise demonstrated that implementation of the Strategy is feasible and that removal is likely to produce significant positive outcomes for native species (Wiens et al. 2021).

**Removal is also humane and with substantial precedent.** Removal experiments have shown that lethal removal of barred owls generally occurs with a single shotgun shot (97.4% single shot kills) and that through over 2,485 barred owls removed, not a single non-intended species was accidentally taken (Wiens et al. 2021). While some individuals object to active intervention measures, such as removal of competing non-native species, issuance of Migratory Bird Treaty Act permits to remove non-native species is also allowed and has been successfully utilized elsewhere (Oretega et al. 2025).

In closing, as conservation organizations concerned with species extinction, we support barred owl removal as a necessary conservation measure. **We ask that you work to continue federal funding for barred owl removal and, at a minimum, do not actively work to slow, minimize, or interfere with barred owl removal.**