

August 20, 2018

Dr. Rodney Siegel, Exec. Director
The Institute for Bird Populations
P.O. Box 1346
Point Reyes Station, CA 94956-1346

Dear Dr. Siegel,

Thank you for the opportunity to review the **Draft Conservation Strategy for the California Spotted Owl, version 1.0**, by the Pacific Southwest Region of the U.S. Forest Service. In general this was a very well-written document, with a clear writing style that made the review of this large document much easier.

Content and scientific support was generally good throughout, although I noted a variety of places throughout the document where appropriate citations were lacking. I would also encourage the authors to be very clear about what they mean by “resistant”, “resilient”, and/or “diverse” habitat and how suitable (high quality?) CA owl habitat fits into those categories (or not). The glossary is very helpful, but it comes at the end of the document it doesn’t even include the term “resistance” or “diversity” as they relate to forest conditions, and these terms were used a lot throughout the document (and from the very beginning).

I have also noted what appeared to be inconsistencies in a variety of places, particularly as it relates to fire-risk and suitable CA owl habitat (pg. 35), and the integration of the two primary conservation measures (pp 44-52). The section on “Barred Owl Populations” could be improved (pp. 39 – 40) in regards to interpretation of current literature, and by the addition of citations in several places.

Overall I think the biggest issue with this document was reconciling the two major conservation strategies (i.e., creating “resilient and resistant” landscapes, vs. the necessary conservation of big trees for owls). I think overall, the specific prescriptions provided towards the end of the document outline how that will happen, and in several places the text suggests that “old trees” will be conserved and that is a primary objective – which is good. However in other places there is contradictory information that suggests owl activity centers can be cut over and habitat quality “reduced”, so it then sounds like achieving the two goals (resilience and conserving owl habitat) are incompatible. It’s not clear why that has to be the case. In particular, I am concerned by the plan to remove PACs from protection if they have not been occupied for 3+ consecutive years. The idea that these sites will not be reoccupied, is not in fact well supported by the literature (i.e., unoccupied sites with suitable habitat can/will become occupied at non-zero rates – even when BO are at high densities). So the way this reads currently is that there is a clear path to removing a PAC from protection, but it is unclear how/when new PACs will be created and/or added under the protective umbrella for CA owl habitat.

I used track changes to note the areas of confusion and/or contradiction throughout the document, as well as any concerns I had about specific statements. Hopefully my specific comments are helpful, and I appreciate the hard work that went into to drafting this comprehensive document.