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Public comment for NSO Stakeholder Meeting scheduled for 10/23/2019

Due to the increased abundance of barred owls, current NSO single birds and pairs are getting moved around frequently on an annual basis and outside of historic detection locations and the best nesting/roosting habitat. This annual movement is resulting in additional ACs being established in every year based on current Attachment A guidelines of establishing an AC. In one example, during the last 4 years for a specific NSO pair, this movement is resulting in an additional 4 activity centers that have been established for the same pair in addition to the historic AC. That is five ACs for the same pair. Regulatory staff is now asking for all of these detections to be protected as separate Activity Centers and in some cases, regulatory staff is asking for separate core zones for multiple ACs.

Attachment A suggests that there could be more than one AC for a NSO territory, however, is there a maximum? Where in Attachment A does it suggest additional core zones for additional ACs for the same territory?

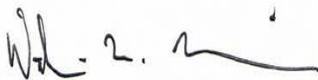
Attachment A guidelines suggest the process of ranking of detections to determine the establishment of an AC. When reproductive behavior is observed and a nest is located, why are regulatory agencies still requiring additional ACs and separate core zones for a single detection that may have occurred for the NSO territory in previous years? Does not the nest with the NSO pair with reproductive behavior result in a higher rank and more significance than a single male detection from a

previous year? There is no AC abandonment process or possibilities through regulatory agencies anymore and thus this situation has made the current guidelines in Attachment A to be a flawed guidance document that does not allow for the ranking of detections for establishment of an AC. If a nest or reproductive status is observed, that detection should theoretically outrank other detections that are not as significant but there is no way to abandon the less significant detections and ACs that have been previously identified. This concept is being ignored by regulatory staff.

Potential solutions would be for regulatory agencies to understand the ranking and significance of detections and when there is a nest and reproductive behavior that is detected, the other detections that are not as significant should not be warranted as separate ACs. It's understandable to include the less significant detections within the core zone associated with a nest, but they should not warrant full AC protection and additional core zones for each less significant location.

The definition of an AC needs to be redefined in Attachment A and focused on nesting and reproductive behavior. In addition, an abandonment process for the less significant detections (ACs) needs to exist if higher ranking detections are observed. That was the intent that USFWS included ranking of detections in Attachment A when establishing an AC.

Thanks for the opportunity to provide comments.

A handwritten signature in black ink, appearing to read "W. Morrison". The signature is fluid and cursive, with a long horizontal stroke at the end.

William Morrison

SWC, LLC