

Montana Audubon

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July 31, 2008

Mr. Steven L. Spangle, Field Supervisor
US Fish and Wildlife Service
2321 West Royal Palm Road, Suite #103
Phoenix, Arizona 85021

Dear Mr. Spangle:

The purpose of this letter is to strongly urge the US Fish & Wildlife Service (FWS) to immediately re-consider the federal status (under the 1973 Endangered Species Act, as amended) of the Sonoran Desert Bald Eagle population, currently comprised of 56 known breeding territories persisting in Arizona.

I feel I am well qualified to comment on this issue. My personal experience includes 7 years as the Southwestern Bald Eagle Recovery Coordinator for the US Fish & Wildlife Service, Albuquerque Regional Office (1980-1987). Furthermore, I have spent the vast majority of my 30-year wildlife conservation career working with raptors in the western United States, and have authored or co-authored numerous scientific papers on the Sonoran Bald Eagle population and other western U.S. raptor conservation topics.

My argument for retaining this population on the federal threatened/endangered species list centers around to two specific issues: 1) This Bald Eagle population clearly represents a "distinct population segment" (DPS) as described in internal FWS documents ("Policy Regarding the Recognition of Distinct Vertebrate Population Segments (DPS) Under the Endangered Species Act" - Feb 1996); and 2) The current and likely future threats to this population are severe, and will most likely deteriorate further due to a combination of trends in human use (development and recreation) as well as environmental (especially climatic) factors.

The importance of this population to the overall health of the species continent-wide cannot be over-stated. The Arizona birds are adapted to an environment that is typically much hotter and drier than other parts of the bald eagle's range. It seems likely that the Arizona population may contain unique and critically important genetic attributes that are essential to the long-term health and survival of the species as a whole. (Additional study of the genetic characteristics of this population is certainly warranted.)

Perhaps the most important reason why the Arizona Bald Eagle population still exists today is because of the protection provided by The Endangered Species Act (ESA). With the loss of that protective status it is unlikely that the species can hold its own in the future with the intensifying threats to its habitat. As a result of climate change and

Chapters:

Bitterroot
Bitterroot Valley

Five Valleys
Missoula

Flathead
Kalispell

Last Chance
Helena

Mission Mountain
Polson

Pinlar
Butte • Dillon

Sacajawea
Bozeman

Upper Missouri Breaks
Great Falls

Yellowstone Valley
Billings

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increasing demands for water and space due to rapidly expanding human populations, bald eagles in Arizona face daunting challenges for survival. Without healthy rivers and freedom from human disturbance this species will most likely gradually disappear from Arizona's landscape. Our ability to adequately safeguard the aquatic environment, critical for the breeding success of the Arizona population, can only be accomplished with the protection provided by the ESA.


Some of the most significant threats to the long-term health of the Arizona nesting population are:

- 1) Demands for water-based recreation opportunities in the desert are increasing rapidly. The Nest Watch Program recorded a 3-fold increase in the average number of human activities within 1 km of all monitored bald eagle breeding areas in the last 16 years.
- 2) Prey availability (and fish diversity) strongly influences bald eagle productivity. The introduction of the predatory flathead catfish in the late 1970's has decreased fish diversity and abundance on the upper Salt River. Surveys show a remarkable increase in the flathead catfish, while populations of other fish species have decreased. In turn, productivity of four bald eagle territories on the upper Salt River has decreased sharply from 1.12 young per breeding pair in the 1980's to 0.29 in the 1990's. Native suckers are an important prey item for bald eagles in southwestern riverine systems, and these species do not compete well against introduced fish species.
- 3) Lead and mercury are known to exist in the population at toxic levels. The source of this contamination is likely due to extensive historical mining activity.

Mr. Spangle, I am asking you to please consider objectively reviewing all relevant information on this issue immediately, and **classify the Arizona nesting population as a distinct population segment (DPS)**. It is obvious to me and a majority of other knowledgeable scientists that ESA protection for the Sonoran Desert Bald Eagle population is critical if the species is to persist in the region long-term.

Please keep me informed of your actions related to this matter.

Best regards,



Stephen W. Hoffman
Executive Director