

26 July 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,

It has come to my attention that some major changes in the status of the Southwestern Bald Eagle may be imminent. As an interested party I would like to add my thoughts to the discussion.

To the best of my recollection, formation of the Southwest Bald Eagle Recovery Team coincided with the environmental impact analyses of several proposed federal reclamation projects in Arizona. These were the Central Arizona Project plans that included the proposed Orme Dam, Buttes Dam and the CAP canal system. The Orme Dam plan was a major concern due to the location of 3-4 established nesting territories of Southwestern Bald Eagles within the proposed inundation area.

At this time (mid-1970s) the Bald Eagle nesting in Arizona and New Mexico were considered a distinct and separate population of Bald Eagles based on habitat use and nesting site selection. Considered a separate subspecies ("Southern Bald Eagles") since they occurred below the 40<sup>th</sup> Parallel, Arizona's population was deemed unique and special. Based on this consideration and other factors a separate recovery team was formed by the U.S. Fish and Wildlife Service (FWS). I was a charter member of that recovery team as a representative of Arizona Game and Fish Department. The recovery team consisted of members also from the U.S. Forest Service, Bureau of Land Management and Arizona State University, and headed by FWS.

Distinguishing features of the Southwest Bald Eagle population formulated by the recovery team were use of Sonoran desert as their primary biome, primary use of riparian corridors bisecting expanses of Sonoran desert, and nesting sites which included a large percentage of cliff sites and rock pinnacles along with cottonwood trees. These nesting birds were shown to be highly adapted to the arid conditions and high ambient temperatures of the desert biome during the rearing of the hatchlings. To the best of my recollection, riverine fish species (including carp and native suckers) made up a large portion of eagle diets.

Recommendations outlined and implemented by the Southwest Bald Eagle Recovery Plan specific to the Arizona - New Mexico population in the following years helped increase the number of nesting pairs. Human development and encroachment into the Sonoran desert and highly desirable riparian areas have continued at an alarming rate, especially in the area north of Phoenix metro area where many eagles nest (Salt and Verde River drainages).

It is my opinion, as a former Recovery Team member and retired wildlife biologist, that the Southwest Bald Eagle as a distinct population (discrete population segment) is still a viable classification of these birds. I further feel that the impact of a rapidly increasing human population and associated recreational use, water use / demand, and habitat use are a major concern to these birds. It is my opinion, additionally, that lumping this discrete population with the northern and eastern populations is not in the best interest of the Southwestern birds and their continued recovery / existence.

Sincerely,



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