

FLORIDA CHAPTER THE WILDLIFE SOCIETY



PO Box 579
Bristol, FL 32321
30 September 1999

Jody Gustitus Millar
Bald Eagle Recovery Coordinator
U.S. Fish and Wildlife Service
4469-48th Avenue Court
Rock Island, IL 61201

Dear Ms. Millar:

This letter constitutes the Florida Chapter of The Wildlife Societies' formal comments on the U.S. Fish and Wildlife Service's (Service) 6 July 1999 proposal to remove the bald eagle from the federal list of threatened wildlife. In 1999 the number of known active bald eagle nesting sites in Florida (1,043) exceeded the recovery goal of 1,000 nesting pairs. This continues a long, uninterrupted period of population growth for the species in the state. Elsewhere in the Southeast, bald eagle populations also continue to increase. All bald eagle recovery goals for the region have or will shortly be met. We therefore find that the proposed action is consistent with the available biological data.

Although we are comfortable that the bald eagle no longer warrants federal listing as threatened, the species still faces threats in Florida that must be controlled if current population levels are to be maintained. Principle among these threats is habitat loss to development. While protective measures of the Endangered Species Act (ESA) were useful in protecting bald eagle habitat, it would be counter to the intent of ESA to leave the species on the threatened list to achieve this end. Rather, we believe it is appropriate for the State of Florida to resume its role as the primary caretaker of the bald eagle, and we encourage the Florida Fish and Wildlife Conservation Commission to consider carefully the need for additional state regulations to protect eagle nest sites from development.

As a final comment, we do not believe the proposed 5 year post de-listing monitoring period will be sufficient to determine if bald eagle population recovery is continuing. Because of the species' longevity and the presence of a large number of "floating" non-breeding adults it could be many years before a slow or moderate population decline would be detected by monitoring nest site occupancy. We suggest that the Service abandon the notion of a short-term effort, and instead consider establishing a funding mechanism and framework for long-term nationwide bald eagle population monitoring.

The recovery of the bald eagle is a major victory for ESA and the agencies and organizations that implement it. The challenge now will be to sustain recovery in the absence of ESA protective provisions. The Florida Chapter of The Wildlife Society is anxious to work with the State of Florida toward this end.

Sincerely,

Susan Fitzgerald
Florida Chapter President

cc: Dr. Allan Egbert, Florida Fish and Wildlife Conservation Commission
cc: Stephen Forsythe, USFWS, Vero Beach, Florida
cc: Linda Finger, USFWS, Jacksonville, Florida