



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

6620 Southpoint Drive South

Suite 310

Jacksonville, Florida 32216-0912

July 8, 1999

The Wildlife Society, Florida Chapter  
Apalachicola National Forest  
P.O. Box 882  
Bristol, FL 32321-0882

Dear Interested Party:

On July 2, 1999, President Clinton announced that the U.S. Fish and Wildlife Service is proposing to remove the bald eagle from the list of endangered and threatened species. The bald eagle is currently listed as threatened under the Endangered Species Act. The recovery of the bald eagle, from less than 500 nesting pairs in the early 1960's to almost 6000 nesting pairs in the lower 48 states today, is a great success.

Enclosed is a copy of the proposed rule to delist the bald eagle. This rule, if made final, will remove the protection afforded the bald eagle under the Endangered Species Act. It will not affect the protection provided under the Bald and Golden Eagle Protection Act, the Migratory Bird Treaty Act, or numerous state laws. The Service is soliciting comments or information you may have relevant to this proposal. Comments must be received by October 5, 1999. Public hearing requests must be received by August 20, 1999. After the public comment period, the Service will analyze all available information and make a determination whether to remove the bald eagle from the list of endangered and threatened species. A final decision on the status of the bald eagle will be made within one year.

Comments and other information regarding the proposed rule should be sent to: Jody Gustitus Millar, Bald Eagle Recovery Coordinator, U.S. Fish and Wildlife Service, 4469-48th Avenue Court, Rock Island, IL 61201 or comments may be sent through our web site at [www.fws.gov/r3pao/eagle](http://www.fws.gov/r3pao/eagle). If you have specific questions about bald eagles in the southeast, please contact the Southeastern Bald Eagle Recovery Coordinator, Linda Walker at (904) 232-2580 ext. 107.

Sincerely,

for David Hankla  
Field Supervisor

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. Principal 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

FROM: millsab / Internet

DDT1=RFC-822; DDV1=millsab@GFC.STATE.FL.US;

TO: Susan Fitzgerald / r8, fl, apalachicola  
Susan Fitzgerald / r8, fl, apalachicola

Part 2

ARPA MESSAGE HEADER

Part 3

Susan,

Absolutely. Do you have a copy of the FR notice? If not, I'm sure I can find it. What time frame would you like on my draft letter so that it can receive appropriate internal review?

Brian

Brian A. Millsap  
Chief, Bureau of Wildlife Diversity Conservation  
Florida Fish and Wildlife Conservation Commission  
620 S. Meridian St.  
Tallahassee, FL 32399-1600  
(850) 488-3831  
(850) 921-7793 FAX

>>> <Fitzgerald\_Susan/r8\_fl\_apalachicola@fs.fed.us> 07/26 1:38 PM >>>

Hi Brian,

As you know USFWS has proposed to delist the Bald Eagle. At TWS board meeting we discussed if the FL Chapter should comment and it was decided we would. Your name came up as the most knowledgeable and best qualified person to write comments for the Chapter. Would you be willing to do that for us? The comment period ends October 5, 1999.

Thanks,

Susan