

25 July 2008

Mr. Steve Spangle, Field Supervisor
U.S. Fish and Wildlife Service
Arizona Ecological Services Office
2321 West Royal Palm Road, Suite 103
Phoenix, AZ 85021-4951

Subject: Comments on Bald Eagle Status Review in the Sonoran Desert

Dear Mr. Spangle:



We have been invited by colleagues to provide our perspective on the status review of bald eagles in the Sonoran Desert.

After evaluating much of the information available, we contend that bald eagles in the Sonoran Desert Area clearly represent a distinct population segment (DPS). The population meets all criteria for a DPS, and available evidence suggests that immigration rates are low, indicating that the population is unlikely to be supported from other populations. Given that there are only about 50 breeding pairs in the population, without strong protection of eagles, the habitat they occupy currently, and additional habitat to support new pairs in the future, the odds of the population persisting over the long-term are uncomfortably low. Ultimately, we feel that the principal questions as to the future status of bald eagles relate to the amount and degree of protection necessary for continued recovery of this population, and whether alternative legislation provides a sufficient framework for their protection and recovery.

If threatened status under the Endangered Species Act (ESA) is removed, bald eagles in the Sonoran Desert Area will remain protected to some degree under other legal mandates (e.g., Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act). However, we suspect that human use and development of areas important to bald eagles in this region are likely to increase substantially in the future, and we question whether current and future habitat for bald eagles would be protected sufficiently if ESA status is eliminated. Thus, in our view, the decision as to whether to remove ESA protection for bald eagles in the Sonoran Desert Area should hinge on assurances that alternative legislative mechanisms are sufficient to protect all eagles and their habitat in the region.

We appreciate the opportunity to comment on this important issue

Sincerely,



Dr. R. William Mannan and Dr. Robert J. Steidl

