



Robert Mesta  
Sonoran Joint Venture Coordinator  
Office of Migratory Birds  
U. S. Fish and Wildlife Service  
12661 E. Broadway Blvd.  
Tucson, AZ 85748

Dear Mr. Mesta:

This letter constitutes the Raptor Research Foundation, Inc.'s (RRF) formal comments on the U. S. Fish and Wildlife Service's (FWS) *American Peregrine Falcon* (*Falcon peregrinus anatum*) *Proposed Monitoring Plan*, as announced in the 31 July 2001 Federal Register. RRF is the scientific society that represents professional raptor scientists and managers around the world. Our review of the American peregrine monitoring plan was conducted by a committee of RRF members operating under the umbrella of the RRF Conservation Committee. That committee consisted of RRF members Gordon Court, Jim Enderson, Robert Kenward, Michael Kochert, Brian Millsap, Carol McIntyre, Joan Morrison, and Ted Swem. The RRF committee's recommendations were derived by a majority vote of the members, but it should be noted that not all committee members agreed on every point. The RRF Board of Directors then approved the committee's consensus recommendations.

RRF transmitted its initial thoughts on the post de-listing monitoring plan for the American peregrine in our formal letter to the FWS in support of the proposed de-listing action on 26 October 1998. While we commend the FWS for moving forward on the American peregrine monitoring plan, we question why it took so long for the plan to be released, and urge that in the future such plans be proposed concurrent or nearly concurrent with de-listing.

We have 5 areas of specific concern with the plan as proposed, and 2 suggestions for expansion. Our concerns and suggestions are outlined below.

**1. *Lack of a clear objective.*** The FWS provides no clear objective for the monitoring plan. We believe a clear, unambiguous objective is essential to keep monitoring on track, and to evaluate whether or not the plan is achieving its intended purpose. Given that this monitoring effort is specifically intended to ensure peregrine falcons do not decline

following de-listing, RRF recommends the stated objective of the monitoring plan be “**To detect a decline in the number of occupied American peregrine falcon territories and a decrease in nesting success from current levels.**” This objective also seems most consistent with the design of the monitoring effort, as proposed.

**2. Selection of territories for monitoring.** We feel strongly that a protocol must be developed and followed that ensures incorporation of a mix of newly found territories and historically occupied territories in the sample pool for monitoring. Toward this end, we recommend the FWS employ a process whereby territories selected for monitoring be drawn either randomly or systematically from a pool of all known territories.

**3. Standards for classifying a territory as vacant.** Correct classification of a territory as vacant or occupied can be very difficult. The probability of correctly classifying a territory improves with the number of visits and amount of time spent there. We recommend a sampling protocol be developed that requires at least 2 and preferably 3 visits of no less than 4 hours each be conducted before a territory is classified as vacant.

**4. Age of young before a territory is considered successful.** We believe the monitoring plan should provide some guidance on the age young need to attain before that territory is classified as successful. We recommend that age be 10 days and, Cade et al. (1996. Guide to Management of Peregrine Falcons at the Eyrie, published by the Peregrine Fund, Boise, Id.) be used as a standard reference for that determination.

**5. Thresholds for status review.** We have concerns that the proposed thresholds for initiating a status review are well within the range of values that have been observed for these parameters in healthy peregrine populations. We urge caution in jumping to conclusions about the status of populations given these levels of occupancy and nest success, and suggest more careful review be given to this issue by the coordinators of the monitoring effort.

In addition to these comments, there are two areas not addressed by the existing proposal that we want to comment on. These are outlined below.

**6. Contaminants monitoring.** It is widely accepted by the scientific community that exposure to environmental contaminants was the single factor that nearly caused the extirpation of peregrines from North America. Although restrictions on the use of DDT and related pesticides in the United States and Canada allowed peregrines (and other predatory birds) to recover, these compounds are still manufactured in the United States and their use continues in many countries where peregrines that nest in North America and their migratory prey winter. Further, the introduction of new anthropogenic chemicals to the environment far outpaces research on their effects on wildlife. Thus, we believe that peregrines will remain vulnerable to environmental contaminants despite their recent population recovery. An effective peregrine monitoring program, therefore, must include periodic sampling to document trends in contaminant loads and new contaminant threats. Sampling need not be conducted frequently or include a large

number of samples to accomplish these goals, however. We offer to work with the FWS on sampling design if this would be helpful.

**7. *Survival of adult and young peregrines.*** Knowledge of survival rates of adult and, in particular, pre-breeding peregrines from a few localities throughout the American peregrine's range would add greatly to our knowledge of peregrine population biology. Because the pool of nonbreeding adult peregrines could be quite large, a significant decline in numbers could occur before it was manifested in a decline in occupied territories, particularly if monitoring was weighted toward high-quality territories. Moreover, understanding survival would permit a more complete evaluation of the effects of the harvest of peregrine falcons by falconers. RRF has supported the FWS's proposal to allow a very modest harvest of wild peregrines by licensed falconers, but we would likely oppose an increase in harvest levels in the absence of defensible survival data and a more complete demographic assessment. RRF does not recommend that a survival component be added to the current monitoring plan because of the added complexity, but we do suggest the FWS seek to promote and support a well-designed study to obtain this information from at least two American peregrine falcon subpopulations. Such a study would likely require radio- or satellite tagging of a reasonable sample of peregrines over at least three years.

If you have questions or concerns about our comments, or if the RRF can provide further assistance in the development of this monitoring plan or the other components of monitoring we advocate, please do not hesitate to contact me. We stand ready to help.

Sincerely,

Michael N. Kochert,  
President