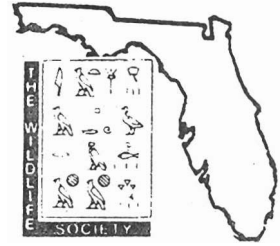


Brian

FLORIDA CHAPTER
THE WILDLIFE SOCIETY



114 Meridian Hills Rd.
Tallahassee, FL 32312
(904) 488-3831

September 28, 1994

Mr. Robert Adair
Chief, Division of Endangered Species
U.S. Fish and Wildlife Service
Bishop Henry Whipple Federal Building
1 Federal Drive
Ft. Snelling, MN 55111-4056

Dear Mr. Adair:

The Florida Chapter of The Wildlife Society would like to comment on the proposed rule to reclassify the bald eagle (*Haliaeetus leucocephalus*) from endangered to threatened in most of the lower 48 states (Federal Register, 50 CFR Part 17, July 12, 1994).

The State of Florida accounts for approximately 68 percent of all bald eagle breeding areas and young produced in the Southeastern Recovery Region. Occupied breeding areas in Florida continue to increase (535 in 1990 to 667 in 1993), and reproductive success has equaled or exceeded recovery goals during this period. Thus, the bald eagle population in Florida has surpassed all criteria for downlisting.

There are, however, continued threats to bald eagles within the southeast and Florida. Although some threats have been reduced (DDT and illegal shootings), other threats, including the toxic effects of mercury, accelerated development, and human disturbances, remain. These threats are lessened by the uncommonly comprehensive protection afforded bald eagles by Federal wildlife laws (Section 7 and 9 of the Endangered Species Act, the Bald Eagle Protection Act, the Migratory Bird Treaty Act, and the Lacey Act). Because downlisting the bald eagle from endangered to threatened status will not affect protection under these laws, and considering the reproductive success of bald eagles in Florida, the Florida Chapter of The Wildlife Society fully supports the proposed rule to reclassify the bald eagle as a threatened species in most of the lower 48 states.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian A. Millsap', with a large, sweeping flourish at the end.

Brian A. Millsap, President

cc: Executive Board