

August 12, 2008

Robin Boughton
Peregrine Falcon Management Plan Comments
Florida Fish and Wildlife Conservation Commission, Northeast Region
1239 SW 10th St.
Ocala, FL 34471-0323
Via email to peregrine@MyFWC.com

Dear Ms. Boughton:

Thank you for the opportunity to comment on FWC's proposal to remove the Peregrine Falcon from the list of imperiled species in Florida. We have some suggestions for the species' management plan to help ensure Florida continues to contribute to the health of this population.

While Peregrine Falcons do not breed in Florida, they migrate through our state and winter here. Migrating raptors including Peregrine Falcons funnel down Florida's coastlines on their annual migrations, hunting as they go. Due to raptors' preference for migrating over land, coastal land masses bounded by water, such as barrier islands and capes, have concentrating effects on these birds. Large numbers of Peregrines are regularly recorded in locations such as the beach islands of St. Augustine, the Florida Keys, Cape San Blas and the Panhandle's Bald Point. Concentration points such as these are great sources of vulnerability for falcon populations, but also present opportunities for effective, targeted conservation actions.

Wind Power Siting

Florida's wind power generation potential may not be that of the rest of the country, except on our coastlines¹. Due to growing interest in alternative energy sources, we anticipate there will be increased interest in exploring wind power generation in those parts of Florida where sufficient wind resources exist. It is important to recognize, however, that it is in these same coastal locations that wind technology may have the greatest potential for significant wildlife impacts, especially for migrating raptors like Peregrine Falcons. For these reasons, we feel it is essential that pre-siting wildlife surveys have sufficient rigor and duration to accurately anticipate any unintended wildlife consequences of each siting. Florida should develop wind power siting guidelines such as those adopted by the state of California² with particular emphasis on the potential for impacts to wildlife (including falcons) in locations with risk factors including coastal location, proximity to wetlands, presence in a migratory corridor, and documented presence of species of interest (declining, imperiled or managed species). Because wind power generation has not yet be utilized commercially in Florida, siting protocols for

¹ National Renewable Energy Laboratory, <http://rredc.nrel.gov/wind/pubs/atlas/maps/chap2/2-01m.html>

² September 2007. California Energy Commission. *California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development*, CEC-700-2007-008-CTF. <http://www.energy.ca.gov/renewables/06-OII-1/index.html>

these facilities have not yet been established. The FWC under the Peregrine Falcon Management Plan will need to ensure the FWC provides input on these facility sitings, to ensure they do not have disproportionately large impacts on migrating raptors like falcons, due to the concentration of these migrating birds in the areas of Florida with the highest wind energy potential.

Land Acquisition

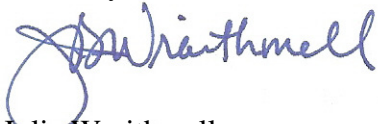
While many of these concentration points for migrating raptors occur on public lands, significant coastal concentration points, particularly in the Florida Keys, remain in private ownership and are accordingly subject to development. The Florida Acquisition and Restoration Council has placed a priority on the Florida Keys Ecosystem Florida Forever project. The Peregrine Falcon Management Plan should support this priority and encourage the acquisition or protection by easement of important migratory staging habitat in the Keys.

Falconry Harvest

With the federal delisting of the Peregrine Falcon, the falconry community has expressed an interest in wild harvest of these birds for hobbyist use. Our more than 30,000 members in Florida are particularly concerned that due to the concentrated presence of these birds on migration in Florida, Florida will become a destination for the country's falconers, bearing a disproportionate burden of any harvest. We have grave concerns that these birds cannot be easily attributed to a particular breeding population (because the populations mix on migration here in Florida) and that this ambiguity coupled with a lack of population monitoring makes this harvest difficult to support. Furthermore, we do not feel the magnitude of demand for these birds has been demonstrated and recommend that before wild trapping is permitted in Florida, FWC should evaluate the demand for these birds and why that demand cannot be met with captive bred and unreleasable rehabilitated falcons. While the USFWS may set national harvest limits for these birds, the FWC should exercise its authority over Florida's wildlife to limit this harvest in Florida and use these concerns to inform its advocacy with the Flyway Council.

Thank you for this opportunity to comment. If you would like clarification on any of the above points, please do not hesitate to contact me at (850) 224-7546 or jwraithmell@audubon.org.

Sincerely,



Julie Wraithmell
Wildlife Policy Coordinator