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30 July 2008

Public Comments and Processing
Attn: FWS-R2-ES-2008-0059
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, Suite 222
Arlington, Virginia 22203

RE: Status Review of Bald Eagle in the Sonoran Desert region of
Central Arizona and Mexico.

These comments address issues around the status of a disjunct and the likelihood of a biologically significant population of bald eagles (*Haliaeetus leucocephalus*) within the American Southwest and adjacent Mexico.

It seems that one of the highest priorities of the FWS is to help maintain biological diversity in an age when we are rapidly losing such diversity. It has been demonstrated many times (any general college Evolution or Genetic text book can be referenced) that the process of evolution and the creation or maintenance of diversity takes place at the periphery of the ranges of plants and animals, or also under unique conditions. The center of ranges seldom produce such changes. It is this very process that will help maintain biodiversity in an earth that is being rapidly simplified and made homogeneous. Bald eagles within the Sonoran Desert regions of North America and Mexico (hereafter "population") fit both scenarios.

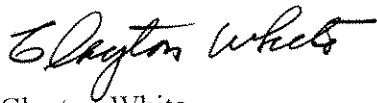
At the outset, nothing is known of the genetics of the "population." It seem to be a mis-judgement on the part of the FWS not to recognize them as a Distinct Vertebrate Population Segment (DPS) under the ESA and accord them protection under that act. Then, learn something of their genetics. There are an minimum of two compelling reasons for such designation (DPS). It is well recognized that climates are changing whether one argues or not what part humans play in the process. The climate in parts of North America at least is becoming ameliorated and warming. One only hs to travel to Alaska to see this. We are seeing those organism that can move extend ranges northward or upward on mountains. Eagles in the Sonoran region may well have the advantage, as populations elsewhere are affected, because of the adaption to arid condition. The "center of the range" is now no longer important. I am sure their adaptations to such unique conditions for the species will be discussed by other respondents.

A second and perhaps more practical reason for extending such protection is that water in arid

regions maintain a host of other organisms that may be unique to the region. With the high demand by humans, who have not yet figured out how to control resource usage, water will become a premium. The riparian regions where eagles occur will receive a modicum of protection and in the process maintain water resources for the host of species that ride along with that protection.

Based on the amount of money that the citizenry has spent on the bald eagle recovery it seems a "no-brainer" not to protect such a unique "population." This letter could go on at great length about bald eagles, arid regions, the value of the ESA and so forth, but I am sure other will touch on those topics. I thus urge the FWS to afford the bald eagles of Arizona's Sonoran region a distinct population status (DPS) in relation to other bald eagles and afford them protection under the ESA.

Sincerely yours

A handwritten signature in cursive script that reads "Clayton White". The signature is written in black ink and is positioned above the typed name.

Clayton White
Professor of Zoology
Department of Plant and Wildlife Sciences