



July 14, 2008

California Department of Fish and Game  
Wildlife Species Conservation Program  
Attn: Lyann Comrack  
1812 Ninth Street  
Sacramento, CA 95814

**RE: De-listing Petition for the American Peregrine Falcon in California**

Dear Lyann,

On behalf of Audubon California's nearly 100,000 members and supporters, I thank the California Department of Fish and Game for the opportunity to comment on the proposed delisting of the *Falco peregrinum anatum* subspecies in California. The remarkable recovery from just five pairs in 1970 to over 300 active breeding sites in 2008 is a tribute to the combined efforts of dedicated non-profit groups as well as efforts by state and federal agencies.

On June 26<sup>th</sup>, Audubon California staff convened a forum of Peregrine Falcon experts to discuss the issue (see the attached memorandum for details). Based on this forum, coupled with our own independent analysis, a strong scientific case exists for the delisting of this subspecies. Audubon supports the delisting, provided that subsequent follow-up activities are built into the decision to ensure that population monitoring remains a part of the on-going peregrine management effort. We urge the Department of Fish and Game and allied public and private organizations to work together to invest the necessary resources to create and support such an improved statewide monitoring effort. Without future monitoring of nesting activity, nesting success, and tests for new contaminants like PBDE, biologists will not be able to detect new threats until the population is severely decreased.

The current federal monitoring plan relies on random samples of 30 pairs from California and funding is scheduled to run out in 2015. While this sample is potentially large enough to identify contaminants from nests if added to the sampling protocol, this testing needs to be funded. In addition, this sample size is unlikely to detect overall population decreases in California, so greater sample sizes should be considered by DFG biologists. Stable funding will be key to the continued recovery of this iconic subspecies.

Sincerely,

Gary Langham, Ph.D.  
Director of Bird Conservation