

WDFW RESPONSES TO SEPA AND PSR PUBLIC COMMENTS

WDFW responses to public comments received during the 90-day concurrent public review periods for the draft *Periodic Status Review for the Peregrine Falcon in Washington* conducted from July 12, 2016, to October 10, 2016. The comments presented here are summaries of the remarks provided by one or more people.

Report Section	Comment and Response
General comments	<p>1. I agree with state delisting of peregrine falcons.</p> <p><i>WDFW is recommending that peregrine falcons be removed from the Washington sensitive species list because the species no longer meets the definition of sensitive under state law (WAC 232-12-292, Section 2.6), thus delisting is the most appropriate action to take regarding the species' legal status. Organochlorine pesticides, mainly DDT, caused the decline in Arctic and American peregrine falcon populations in North America, adversely affecting peregrine falcons by causing direct mortality by poisoning or by adversely affecting reproduction by causing egg breakage and hatching failure. The most significant factor in the recovery of peregrine falcons was the restrictions placed on organochlorine pesticide use in the U.S and Canada in the early 1970's. Aided in some regions by the release of captive bred falcons, peregrine populations have increased and expanded their range. Population indices historically affected by organochlorine contamination, namely territory occupancy rates, nest success, and productivity, have improved over the years and continue to be consistent with values observed in stable or increasing populations.</i></p>
	<p>2. I agree with state delisting of peregrine falcons. This should be accomplished with continued monitoring to assure that future stressors such as climate change or new pesticides do not negatively impact the bird.</p> <p><i>WDFW agrees with the first remark. See the response to Comment 1. If the Fish and Wildlife Commission agrees with the Departments recommendation to delist the peregrine falcon state law requires a review of the status of the species at least once, five years following the date of delisting (WAC 232-12-292, Section 10.2).</i></p>
	<p>3. I support maintaining endangered status for the peregrine falcon primarily because of habitat loss.</p> <p><i>See the response to Comment 1. Contamination by organochlorine pesticides, not habitat loss, was the cause of population declines in peregrine falcon populations in North America.</i></p>
	<p>4. I support the strongest possible protections for the listed species...peregrine falcon...and all other species considered by the WDFW.</p> <p><i>See the response to Comment 1.</i></p>
	<p>5. I am not in favor of moving species from endangered to threatened. Habitat loss continues for ...peregrines. It is known that humans continually demand more areas that these species frequent, causing habitat loss.</p>

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	<i>See the response to Comment 1. Contamination by organochlorine pesticides, not habitat loss, was the cause of population declines in peregrine falcon populations in North America.</i>
	6. WDFW has not conducted a population survey of this bird since the Washington Forest Practices Board approved removal of Peregrine Falcon critical habitat from forest practice rules. This bird should continue to be listed as endangered until a new survey can demonstrate if there have been any negative effects to this bird's population. No survey has been done since 2009, so consideration to remove this bird is very premature.
	<i>Washington State Forest Practices Rules identify critical habitat for endangered and threatened species, but not sensitive species (WAC 222-16-080). The peregrine falcon was reclassified to state sensitive status in 2002. Since then, peregrine populations have continued to increase. In 2012, WDFW surveyed a random sample of 25 nesting territories for the American peregrine falcon subspecies and found continued high occupancy rates (84%), high nest success (76%) and high productivity rates (1.81 young per occupied nesting territory) consistent with stable and increasing peregrine populations.</i>
