

# Comment on the proposed delisting of *Campephilus principalis* – the Ivory-billed Woodpecker (Docket # FWS–R4–ES–2020–0109)

By David Luneau – 15 November 2021

The Ivory-billed Woodpecker was placed on the Endangered Species List in 1967, 23 years after the often-cited “last commonly agreed-upon sighting of the species” in 1944. In 2021, a mere 16 years after at least 17 sightings, mostly by highly-capable field ornithologists, the US Fish and Wildlife Service is preparing to declare the species extinct. It seems quite premature to do this.

I wish to point out a mistake in “Federal Register / Vol. 86, No. 187 / Thursday, September 30, 2021 / Proposed Rules.” This mistake is used to support the extinction assumption. From p. 54307:

Further, although the bird in the video was first interpreted as an ivory-billed woodpecker, there is dispute among the ornithological community as to whether it was an actual ivory-billed woodpecker or instead a pileated woodpecker (*Dryocopus pileatus*). No conclusive videos gathered since then that confirm the persistence of the ivory-billed woodpecker [*sic*]. **After additional extensive analysis of the recordings, it was determined that these recordings do not constitute evidence of the presence of ivory-billed woodpeckers (Charif *et al.* 2005, p. 1489; Fitzpatrick *et al.* 2005, p. 1462; Jackson 2006, p. 3) [Emphasis added].**

This is incorrect. The cited publications by Charif *et al.* and Fitzpatrick *et al.* declare the opposite of what is stated. Only Jackson 2006 proposed that the video did **not** constitute evidence of the presence of ivory-billed woodpeckers. There were further publications by Fitzpatrick *et al.* responding to Jackson’s claims. As one of the co-authors of those papers, I assure you that the authors steadfastly maintained that the bird in the 2004 video was indeed an ivory-billed woodpecker.

In the Appendix B of the Recovery Plan for the Ivory-billed Woodpecker (US FWS 2010), the FWS position was clearly stated:

After weighing the various positions, the FWS accepts the interpretation of Fitzpatrick *et al.* (2005, 2006, 2007). FWS concludes that other published interpretations by Sibley *et al.* (2006), and by extension Collinson (2007), are based on misinterpretations of video artifacts as plumage, and novel interpretations of typical bird flight. In Collinson’s

comparison of the Luneau video to videos of known Pileated Woodpeckers in flight, we believe the misinterpretations also include inappropriate comparison of interlaced images of known Pileated Woodpeckers in flight with the de-interlaced images of the woodpecker in the Luneau video.

It appears that since 2010, the FWS has changed its interpretation of the data, even though the data has not changed.

A glaring omission in the delisting proposal was the lack of any mention of the 1971 photograph by Fielding Lewis of an ivory-billed woodpecker in Louisiana. The bird in the photograph is clearly an ivory-billed woodpecker. The only way to doubt that is to accuse Mr. Lewis of climbing high in a tree and placing a painted “decoy” on the side of the tree and photographing it. While some believe he did just that, I think it is a bit of a stretch to think that a 300 lb. man could do that. However, if the underlying assumption is that the species is extinct, then all manner of conspiracies can be invoked to support that assumption. While a 1971 photograph doesn’t prove that the species is still around, it does span a 27-year gap of continued survival from the 1944 sighting. Again, it has been only 16 years since the 2004-5 sightings.

Additional evidence from 2009 in Louisiana has only recently come to light. In his book, *The Ivory-billed Woodpecker: Taunting Extinction*, Guy Luneau analyzes a photograph taken by a game camera that was aimed at a suspected ivory-bill roost cavity. He concludes that the two birds in the photograph are ivory-billed woodpeckers based on detailed measurements and statistical analysis.

The ivory-billed woodpecker has historically been thought to be extinct on several occasions and has on each occasion defied those who would think it to be extinct. I certainly hope that the Service doesn’t do the species a disservice by “officially” declaring it extinct.