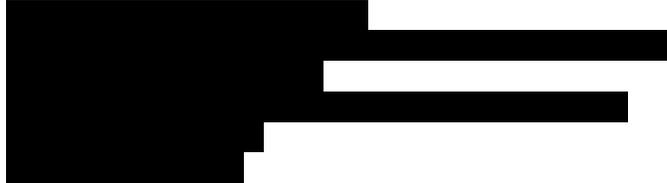




NORTH AMERICAN FALCONERS' ASSOCIATION

July 7, 2010



Dear Sir,

The Service Regulations Committee of the U.S. Fish and Wildlife Service (USFWS) did not make a decision recently regarding allocations for the 2010 passage peregrine take season for falconers. The SRC has referred this matter back to the three involved Flyway Councils, the Atlantic, the Central and the Mississippi.

The North American Falconers' Association (NAFA) requests your support to allocate the peregrine take for falconry based on (1) maximizing the allowable take and (2) allocating the permits to participating states in a biologically justified and properly proportioned manner.

Currently only a total of thirty six (36) peregrines are allocated for take by permit for the area east of the 100th meridian. This allocation must be divided between the three affected Flyways. Last year the Mississippi Flyway agreed and allotted six (6) permits to the Atlantic Flyway. This was reasonable considering the paucity of trapping locations and level of interest shown amongst the states within the Mississippi Flyway. We seek your support for *no less* than this same allocation for the 2010 season. NAFA *prefers* an even more conservative allocation of four (4) permits to be divided between the two participating states in the Mississippi Flyway, those being Arkansas and Mississippi, with two (2) permits going to the Central Flyway and six (6) to the Atlantic. NAFA recommends an allocation of eighteen (18) permits to the Atlantic Flyway, fourteen (14) permits to the Central Flyway and four (4) to the Mississippi. The primary reason for the higher number requested for the Atlantic Flyway is the number of participating states. In the event, however, that public access to coastal areas in Mississippi are not available for trapping during the 2010 season, NAFA recommends that Mississippi reallocate their permits this season. This scenario would provide for nineteen (19) permits for the Atlantic Flyway, fifteen (15) for the Central Flyway and two (2) permits for the Mississippi Flyway.

In support of these recommendations, NAFA wishes to convey the following:

- In 2009, only nine (9) falconers, seven residents and two non-residents applied for permits in the Mississippi Flyway. Five (5) applicants in Arkansas and four (4) applicants in Mississippi.
- Falconers in the Mississippi Flyway can participate in non-resident take in most, if not all participating states in the Atlantic and Central Flyways with a greatly improved chance of success after obtaining a permit from that state. Ten birds were trapped in Texas last year and ten others in various states in the Atlantic Flyway.
- Irrespective of the actual allocation for 2010, NAFA encourages all participating states to allow non-residents an equal opportunity to trap passage peregrines under this program.

A partial reallocation from the Mississippi Flyway to other Flyways would increase opportunities for success. This would still allow falconers in participating states (in this case Mississippi and Arkansas) in

the Mississippi Flyway to apply for and trap “in their own backyard” and take little away from the opportunities for other falconers to take a peregrine.

Although we encourage participation in the program by all states, at present NAFA recommends that the Flyway Councils favor allocation of permits to those states with established peregrine migration routes and public access to trapping areas (beaches). NAFA also recommends that the Flyway Councils weight permit allocation to those states with the maximum program participation and level of interest. Attached to this letter is general information gathered by NAFA regarding the 2009 trapping season for peregrines.

Also we respectfully request your consideration to prepare and submit a letter from the Flyway Council to the USFWS calling for a relaxation of the incidental take restriction on resident peregrines under the current passage peregrine take program. By increasing the passage peregrine take for falconry from the current 1% to the 5% approved by the USFWS under the recent EA, the number of northern peregrines allowed to be taken will effectively increase from the present 36 birds to approximately 180 birds. The USFWS has informed us that this request needs to come from the Flyway Councils in writing. An increased allocation would have no significant impact on the resident or target populations, provide additional opportunities for success and practically eliminate current differences of opinion on allocations.

Thank you for your consideration and we hope that we can count on your support for this important matter to falconry and all falconers.

Sincerely,



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Attachment – 1

Cc: [REDACTED]

2009 PASSAGE PEREGRINE TAKE SEASON RESULTS

STATE	Birds Allocated	Applicants	Residents/Nonresidents	Permits to Trap Issued	Permits Filled
MD*	4	12	8/4	12	3
VA*	4	13	9/4	13	4
NC	3	25	12/13	3	2
SC	2	12	12/0	2	0
GA	5	7	5/2	5	1
AR	3	5	5/0	3	0
MS	3	4	2/2	3	1
OK^	2	2^	2/0^	2^	0
TX	10	24	11/13	10	10
TOTAL	36	102		51	21

* To increase the likelihood of filling their quotas, MD & VA issued more permits to trap than birds allocated.

^ The peregrine take season in OK was open to all falconers both residents and non-residents. The OK-DWC required notification prior to attempting to trap a peregrine. Two falconers attempted to trap peregrines in OK.