

# **Exhibit C**

**Supplemental  
Public correspondence received as of  
February 6, 2020**

**Roxann B Borisch**

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**From:** Bob Sallinger <bsallinger@audubonportland.org>  
**Sent:** Tuesday, February 4, 2020 10:15 AM  
**To:** ODFW Commission  
**Subject:** Portland Audubon comments on falconry rules for ODFW Commission Hearing  
**Attachments:** 2-2-20 Portland Audubon Comments regarding ODFW Falconry Rules.pdf

Dear ODFW Commissioners,

Please accept the attached comments from Portland Audubon regarding the falconry rules that will be considered by the commission this Friday.

Respectfully

Bob Sallinger

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Bob Sallinger  
Conservation Director  
Audubon Society of Portland  
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February 2, 2020

Dear Chair Wahl and ODFW Commissioners,

These comments pertain to the update of the ODFW Falconry Program Rules (Exhibit C) which will be considered by the ODFW Commission on Friday, February 7, 2020. Portland Audubon does not support or oppose the sport of falconry. We have actively collaborated with falconers on the rehabilitation of injured birds of prey at our Wildlife Care Center, ecologically responsible avian abatement projects, training of our resident educational birds of prey and other projects. We have also been called upon to help assist in challenging situations involving falconers including lost, maltreated and illegally taken birds of prey. Our primary concern is that adequate regulations are in place to protect both raptor populations and individual raptors impacted by the sport of falconry.

Our specific comments regarding the falconry rule update are as follows. Except as noted below, we concur with the proposed rule changes:

1) Peregrine Falcons:

- a. We oppose the proposed rule change to eliminate the requirement that falconers with permits to take peregrine falcons from the wild notify ODFW seven days prior to nest entry. We believe this requirement is essential to ensure that adequate nest monitoring has been conducted to minimize risk to nestling falcons and also to help ensure that individuals with adequate climbing and raptor handling skills are conducting the nest entry. Also, many peregrine nests are very closely monitored by the community. Advance notice of nest entry allows ODFW to address situations involving potentially controversial nest sites and head off potential conflicts. The notification requirement represents a small burden for falconers, but is an important tool to reduce both direct risk and controversy.
- b. We oppose shifting the date by which permit applications must be submitted from March 1 to April 1. Delaying the application date by a month will significantly reduce the amount of time available for falconers who are issued permits to find and monitor a nest prior to conducting nest entry. Monitoring is critical to ensure that nestling falcons are the appropriate age at the time of nest entry.
- c. We have significant concerns, but do not oppose the decision to expand allowed take of peregrines to include both master falconers and general falconers. This decision dramatically expands the pool of people who will be eligible to enter peregrine nests and will likely result in a significant increase in the number of nest entry attempts. It is important that ODFW closely monitor the impacts of this decision.

- d. It is important that ODFW resist pressure to reduce or eliminate other protections for peregrine falcons retained in the proposed rule including monitoring requirements, restrictions on take of nestling peregrines (eyases) to individuals between the ages of 15 and 24 days of age, requirements to leave at least one nestling in the nest, and post take notification requirements. These rules are essential to protect peregrine nests and are consistent with protocols followed by conservation biologists conducting nest entry. Eyases less than 15 days of age are less able to thermoregulate and at increased risk of fatalities during nest entry. Eyases over 25 days of age are increasingly mobile and at increased risk of fatalities caused by leaping from the nest during nest entry. These rules are essential to minimize the risk to nesting falcons. Falconers who find these rules to onerous can still acquire a peregrine either via capture post fledging or through purchase of a captive bred peregrine.
  - e. We would strongly urge ODFW to add an additional rule requiring that any individual conducting nest entry at Peregrine eyries for the purpose of obtaining a peregrine under a falconry permit demonstrate competency in both raptor handling and technical climbing. As the rules currently stand, a permitted falconer with no climbing experience is allowed to enter a peregrine nest. They are also permitted to hire a climber with no raptor handling experience to do the nest entry for them. Either scenario puts peregrine nests in unnecessary jeopardy. Only individuals with both climbing experience and raptor handling experience should be allowed to enter nests for the purposes of obtaining a falcons.
- 2) We question the appropriateness of allowing take of wild goshawks, gyrfalcons and red-shouldered hawks for falconry. These are birds that a relatively rarely seen in Oregon and we believe that the opportunity for the public to occasionally view these birds in the wild outweighs the benefits of allowing falconers to take these specific species for personal use, especially given the availability of captive bred individuals representing these species.

Thank you for your consideration of these comments.

Respectfully,



Bob Sallinger  
Conservation Director  
Audubon Society of Portland