

Comments to ODFW Commission on Falconry Rules 2020

Intro and Thanking for Opportunity to Address Commission

Inform the commissioners that I had prepared my proposed changes to the existing falconry rules prior to getting a copy of the proposed changes that the ODFW staff has proposed. I support the changes, such as the addition of peregrine falcons to the species general class falconers may have and also encourage the commissioners to also allow general class falconers to have gyrfalcons as most of the other states permit. Especially since probably 99% would be obtained from raptor breeders, not from the wild.

I also am pleased to see that the peregrine capture permit process has been simplified and all master and general class falconers now have an opportunity to obtain a peregrine, at least until the quota of 10 has been reached, which as you may be aware has never been met, usually only one or two, and some years none have been taken.

Inform members that after 1000's of comments and literature review the USFWS has determined that the take of raptors from the wild for falconry use has never had any significant negative impact to raptor species.

The Raptor Research Foundation a professional scientific organization devoted to the study of raptors supports this finding based on many years of research.

Therefore there is no biological justification for excluding a species or limiting the number allowed for take of any of the raptor species authorized by the USFWS. With the exception of the Peregrine falcon which has limited the take of peregrines because of an international agreement with the Canadian Wildlife Agency.

My further recommended Rule changes are:

Under the Table of classes of falconry licenses: There are some much needed changes in the age limits required to obtain licenses. The age for an apprentice to obtain a license should be reduced from 14 to 12 years of age.

A 12-year old in Oregon can hunt with a deer rifle or 12-gauge shotgun, but not with a kestrel or Redtail hawk? Perhaps some 12-year old would best start with a kestrel, but that could be controlled by their sponsor, required by the regulations. It should not be limited by an age restriction in the regulations. The age for a general should be reduced from 18 to 16 years of age. A 14-year old apprentice currently has to wait 4 years to become a general class falconer in Oregon when the rules state that only 2 years as an apprentice is required before they could become a general class falconer. This is not fair to them and according to ODFW staff was over-looked when the regulations were reviewed in previous rule makings.

Now is the time to make these age changes. Any falconer sponsor can decide at what age they wish start to sponsor a young person and what raptor they may capture. However, they should not have the right to tell others what ages they may sponsor an apprentice.

A previous apprentice of mine at 12 years of age was more knowledgeable in raptor and avian biology than several of my previous apprentices most over the age of 25 years.

Under Section 0002 (5) add Ferruginous Hawk to species allowed for take. They are allowed to be taken in all other states that have a resident population. I estimate from my experience in Utah which has always allowed Ferruginous take, that the annual take would less than be 4 or 5 and some years none.

Under Section 0030; allow nestling goshawk take statewide, same as fledged birds.

Under Section 0030; Remove limits of 3 from Gyrfalcon and Red Shoulder Hawk take. It has never been reached and few have ever been taken so as with all other take restrictions (except peregrines) this restriction like the goshawk restriction is not supported by scientific data. ODFWs policy is stated as; all decisions are supported by the best and latest data available?
