



January, 2017

Craig Faulhaber,  
Raptor Committee Chair, Nongame Technical Section of the Atlantic Flyway Council  
Florida Fish and Wildlife Conservation Commission  
1239 SW 10<sup>th</sup> St.  
Ocala, FL 34471

Dear Mr. Faulhaber,

As in the past, I'm writing you in my capacity as President of the North American Falconers Association (NAFA) to request that the Flyway Councils recommend an increase in the quota of northern peregrine falcons for use in falconry. The most recent data continue to be in favor of significantly increased access to this highly regarded resource for the falconers of North America.

As we understand it, the official position of the USFWS remains as it was in 2008; i.e., that the available information supports normalizing peregrine falcon take by setting falconry take limits at 5% of estimated annual production, and allowing states and provinces to further regulate that take via the Flyways. We recognize that the science regarding population estimates and analysis of isotopes in falconer harvested passage peregrines is uncertain at this time, and we acknowledge that the adaptive management approach is sensible.

Regardless of any existing uncertainty, the USFWS and Flyway Councils agree that population estimates in the 2008 Environmental Assessment (EA) are too low. Given that an adaptive management approach is sensible, the option of making no changes at this time should be set aside. I'm asking the Atlantic Flyway Council to take action and to encourage the Mississippi and Central Flyways to do the same, so that a greater number of falconers will have an opportunity to acquire migrant northern peregrines during the coming fall migration. On behalf of the members of our organization, I respectfully request that any management option leading to a supplemental EA is avoided. Since it is agreed that the population estimates in the 2008 EA are too low, NAFA's preferred approach is to either: keep the harvest rates the same, and update the population estimates, or use some other method of

arriving at an updated harvest estimate (e.g. rather than 5% of the low estimate cited in Franke 2016, use 1% of the low estimate cited in Franke 2015)

If it would help to move this matter along, we are willing to offer assistance with designing, funding, and participating in adaptive management efforts to monitor and re-adjust harvest every five years. As the largest membership falconry organization in the world, we have access to a vast pool of talent and expertise. Many of the most influential biologists and conservationists who helped peregrines recover from the brink of extinction are NAFA members and are willing to help.

At this time, NAFA formally requests that the Flyway Councils seek a Fish and Wildlife Service update on the take limits to a limit that the Service considers biologically defensible, and adheres to adaptive management principles. Please feel free to contact me if you have any further questions.

Sincerely,

Scott McNeff  
NAFA President  
[NAFAPresident@n-a-f-a.com](mailto:NAFAPresident@n-a-f-a.com)  
(207) 604-6283

Cc: NAFA Vice President Sheldon Nicolle, NAFA General Counsel James Maynard, NAFA Board of Directors, Members of the Atlantic Flyway Council

#### References;

Franke, A. 2015. Population Estimates of Northern Juvenile Peregrine Falcons with Implications for Falconry Harvest. Oral presentation. Raptor Research Conference, Sacramento, CA, Oct 4-8, 2015. Available at <http://www.raptorresearchfoundation.org>