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Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

**RE: American Falconry Conservancy's Petition to the Fish And  
Wildlife Service to Revise Management of Passage Peregrine  
Take For Falconry Purposes**

Dear Secretary:

Pursuant to the Administrative Procedure Act, 5 U.S.C. § 553(e), and the Department of the Interior's regulations at 43 C.F.R. Part 14, the American Falconry Conservancy ("AFC") hereby petitions the Department and the U.S. Fish and Wildlife Service ("FWS") to issue promptly regulations under the Migratory Bird Treaty Act ("MBTA"), 16 U.S.C. §§ 703 *et seq.*, to (1) increase allowable take of passage peregrine falcons to the maximum sustainable levels identified in materials relied on by the FWS in crafting its peregrine take policies; (2) eliminate current restrictions prohibiting take of passage peregrines west of 100 degrees W longitude; and (3) eliminate flyway management authority over peregrine harvest and manage peregrines at the state and/or federal levels comparable to the regulatory regimes for other raptors taken for falconry purposes. AFC is persuaded that present circumstances, most notably the full recovery and continually improving state of the peregrine falcon in the U.S., justify such regulatory changes.<sup>1</sup> AFC is also persuaded that such action is supported by the best available science and that such changes will better allow for maximum sustainable take by falconers and an appropriate management regime for regulators.

**Petitioner American Falconry Conservancy**

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<sup>1</sup> Significant efforts are also underway to ease restrictions on international trade in peregrine falcons. For example, AFC understands that the International Association for Falconry and Conservation of Birds of Prey (the "IAF") is proposing to down-list the peregrine falcon from CITES Appendix I (with heavy restrictions on international trade) to CITES Appendix II (with much fewer restrictions on international trade) in recognition of the peregrine falcon's successful recovery. IAF's efforts are based in part on biological evidence of worldwide peregrine recovery addressed at the Second International Peregrine Conference held in Poland in 2007 and at the Conference on the Gyrfalcon and Ptarmigan in a Changing World held in Boise, Idaho in 2011. Easing domestic restrictions on passage peregrine take is fully consistent with this international recognition of the peregrine falcon's fully recovered status worldwide, given the current health of domestic peregrine falcon populations.

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Petitioner AFC is a nonprofit organization founded in 2002 and dedicated to the art of hunting with trained raptors, protecting and preserving the art of falconry for future generations, protecting falconers' rights, and promoting responsible and scientific raptor management to ensure sustainability of healthy raptor populations. AFC believes that citizens have a right to practice falconry within the confines of ecologically and ethically responsible behavior, and seeks to defend that right to the extent it does not conflict with legitimate conservation efforts based upon sound scientific and legal reasoning.

AFC seeks to promote throughout the falconry community quality, humane, and scientifically and ethically responsible falconry practices, as well to instill pride in falconers for the cultural heritage of the sport, and its place in world history. AFC strongly recognizes and supports falconry's continuing contributions to raptor and avian science and ecology. Finally, AFC seeks to open borders between all states and nations for scientifically and ethically responsible trapping of wild raptors, appropriate commerce in domestically propagated raptors, and transportation of all secure species of raptors for use in falconry.

**Background of Current Passage Peregrine Take Rules**

Possession of trained raptors for falconry or propagation is permissible only pursuant to permits issued by the FWS or an approved state program, under federal regulations codified at 50 C.F.R. §§ 21.29 and 21.30. For many years those permits were not available for wild peregrine falcons as peregrines were listed under the Endangered Species Act, 16 U.S.C. §§ 1531 *et seq.* ("ESA"). In 1999, the FWS determined the peregrines had recovered and no longer needed ESA protections. This recovery was due largely to the falconry community's highly successful captive breeding efforts. *See* 64 Fed. Reg. 46,542 *et seq.* (Aug. 25, 1999).

Subsequent to the ESA de-listing, FWS agreed to explore authorizing the take of peregrine falcons from the wild for use in falconry. In November 2007, the FWS Division of Migratory Bird Management issued a Draft Environmental Assessment and Management Plan (the "Draft EA") for the Take of Migrant Peregrine Falcons in the United States for Use in Falconry. *See* 72 Fed. Reg. 63,921 (Nov. 13, 2007). In the Draft EA, the FWS examined six alternatives, including the required no action alternative under which take of peregrines for falconry purposes would remain prohibited in the 48 contiguous states despite recovery. The Draft EA's preferred alternative would have allowed take of migrant peregrines for falconry purposes between September 20 and October 20 from areas of the U.S. south of 31 degrees N latitude and east of 100 degrees W longitude in the 48 contiguous states and in Alaska. Another alternative, Alternative 6, would have allowed take between September 20 and October 20 from anywhere in the U.S. AFC submitted comments on the Draft EA to FWS during the comment period.

In August 2008, the FWS Division of Migratory Bird Management issued the Final Environmental Assessment and Management Plan ("Final EA"), stating its "explicit management goal" to:

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[A]llow a harvest of up to 5% of minimum annual production of Northern peregrines . . . while simultaneously (1) not increasing cumulative harvest of the U.S. portion of the Western or the Alaska segment of the Northern population to a number greater than 81 for the Western segment and 49 for the Alaskan segment . . . and (2) holding estimated take from non-target management populations to no more than two individuals from the Canadian portion of the Western population and seven individuals from the Eastern population[.]

Final EA at 41. This statement identifies a management goal to allow for maximum take without adverse impacts on populations. To that end, FWS examined eight alternatives in the Final EA, and designated Alternative 7 as its “preferred alternative”:

Allow a take of first-year migrant peregrine falcons from 20 September through 20 October from all areas of the U.S. east of 100° W longitude [and] allow take of nestling and post-fledgling first-year peregrine falcons from the nesting period through 31 August west of 100° W longitude (including Alaska).

Final EA at 42. The Final EA also contained an Alternative 8, to “[a]llow harvest of up to 5% of first-year peregrine falcons from all management populations through any combination of resident and migrant harvest.” *Id.* FWS ultimately selected Alternative 7 due to political pressures from Canada and from eastern states and flyways, despite acknowledging that Alternative 8 was the scientifically supported alternative to provide for take in accordance with FWS’s stated management goal and had the “advantage” of treating peregrines like other raptors for purposes of falconry-related take. *See* Final EA at 51.

In preparing the Final EA, the FWS relied heavily on the paper of Brian A. Millsap and George Allen entitled “Effect of Falconry Harvest on Wild Raptor Populations in the United States: Theoretical Considerations and Management Recommendations” (U.S. Fish and Wildlife Serv. Feb. 22, 2006) (hereinafter “Millsap & Allen (2006)”) (attached at Exhibit A). As the Final EA recognizes, Millsap and Allen concluded that “healthy peregrine falcon populations should be able to sustain a harvest rate well **over 2 times the proposed level of 5%.**” Final EA at 10 (emphasis added) (citing Millsap & Allen (2006)); *see also* Exhibit A at 2. Although Millsap and Allen conclude that harvest of up to 10 percent of annual production is likely sustainable, they recommended that take limits be established at one half of maximum sustainable yield<sup>2</sup> (“MSY”) up to 5 percent of annual production, rather than 10 percent. *See* Millsap & Allen (2006), Exhibit A at 2. These scientific findings were the basis for the “management goal” stated in the Final EA:

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<sup>2</sup> Maximum sustainable yield, or “MSY,” is “the greatest harvest rate (in 0.01 unit increments) that does not produce a decline in the number of breeding adults in the modeled populations[.]” Millsap & Allen (2006), Exhibit A at 5.

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“Based on [the 2006 Millsap and Allen analysis], the Service believes the scientific evidence supports the conclusion that a harvest rate of 5% for peregrines throughout North America is appropriately conservative, sustainable, and would have no measurable impact on wild populations of the species and, as such, should not require costly and impractical population monitoring to document actual affects on populations.” (Final EA at 11.)

“[T]he Service does not believe these constraints [limiting harvest to 1% or less for some management populations] are *biologically* necessary in the face of our published assessment that a harvest rate of 5% for peregrines is sustainable and conservative.” (Final EA at 11.)

“The Service believes a harvest of up to 5% of annual production of peregrines is biologically justified and sustainable based on analyses in Millsap and Allen (2006).” (Final EA at 29.)

The FWS’s confidence in the Millsap and Allen conclusions is consistent with FWS’s prior conclusion, in its first falconry-related EA in 1988, that the impact on wild raptor populations of allowing take of wild raptors for falconry in the U.S. was minimal and inconsequential. *See* Millsap & Allen (2006), Exhibit A at 3.<sup>3</sup> However, in the August 2008 Final EA, FWS representatives concluded that significant *political* compromises would be necessary to authorize any peregrine take. But the agency also represented then that once a few years of take data was available; FWS could revisit its primarily “political” decision. As a result, the FWS approved only 36 passage peregrine take permits for the lower 48 states, all of which would be issued to the eastern management population (*i.e.*, east of 100 degrees west longitude). To be certain, the sustainable, acceptable level of take identified in the Final EA, the Millsap and Allen paper, and supported by scientific evidence is inconsistent with an apparent *political* decision to approve only 36 permits. It is now time for FWS to reassess its earlier political conclusions and decisions and make a new scientific decision to expand passage peregrine take from the current unnecessarily conservative level.

### **Requested FWS Action**

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<sup>3</sup> Of course, facts have changed since 1988. However, as Millsap and Allen note, the changes in circumstances favor increased peregrine take. The American peregrine falcon was recovered and de-listed under the Endangered Species Act, 16 U.S.C. §§ 1531 *et seq.* (“ESA”), largely due to the captive breeding efforts of the falconry community. Other significant changes since 1988 include controlled harvests in some areas, and the federal Office of Management and Budget’s (“OMB”) introduction in 2004 of stricter standards for scientific conclusions. *See* Millsap & Allen (2006), Exhibit A, at 3.

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AFC contends that FWS should act to (1) increase the number of permits available nationwide to five percent of annual production, as recommended by Millsap and Allen and found scientifically to be sustainable and sufficiently conservative; (2) open the Western management population (*i.e.*, west of 100 degrees west longitude) to passage peregrine take for falconry purposes; and (3) remove flyway management authority over peregrine falcon capture, and instead manage peregrines like other raptors for purposes of falconry-related capture.

**I. FWS should act to increase allowed passage peregrine take to five percent of annual production, consistent with the management goal stated in the Final EA and the findings of Millsap and Allen.**

AFC petitions FWS to take regulatory action to increase the number of passage peregrine take permits available annually to one half of MSY up to five percent of annual production, in accordance with the management goal identified in its Final EA. Falconer interest in trapping peregrines for use in falconry is much greater than the arbitrarily fixed number of permits (36) currently available, as evidenced by the fact that many more permits are requested each year than are available.<sup>4</sup> Furthermore, FWS's management goal stated in the Final EIS is to allow take of up to five percent of average annual production by healthy populations, which (as noted above) equates to many more permits than the 36 currently available in the lower 48 states. Because the science supports increased passage peregrine take, and because there is much greater demand for permits than availability, FWS should increase the number of permits.

FWS has previously expressed an unwillingness to even consider increasing the number of permits at this time, notwithstanding that the science and the agency's own stated management goal supports issuance of many more than the 36 currently available each year. As the Flyway Council ad hoc Committee tasked with assessing permit allocation methods specifically noted in its Report, "While there is *biological justification* for increasing the number of passage take permits to as many as 180 permits (5% of the estimated average annually [sic] production of fledglings) *other considerations* preclude such at the current time" (emphasis added). Those "other considerations" appear to consist largely of political opposition to increased U.S. passage peregrine take from various interests rather than any valid scientific reasons.

A December 7, 2010 letter from Virginia Poter, the Director General of the CWS and Chair of the Canadian Wildlife Directors' Committee, to Rowan Gould, Assistant Director at the FWS, expresses Canada's opposition to expanded passage peregrine take in the U.S. While Ms. Poter's letter calls for further discussions between Canada, the U.S., Mexico and Greenland regarding passage peregrine take, its concerns are based entirely on the status of the peregrine and its subspecies under Canadian law and Canadian findings about the peregrine's conservation status that run contrary to the state of affairs in the U.S. As noted above, the peregrine has been

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<sup>4</sup> Based on information gathered by its members, AFC estimates that 102 applications were submitted for the 36 permits issued in 2009, and 107 applications for 36 permits in 2010. Obviously, demand far outstrips the limited supply of permits being issued by the FWS at present.

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off the ESA lists for over a decade now and the ad hoc Committee acknowledges that the science supports issuing 180 permits per year. FWS itself acknowledges in its Final EA that up to 308 permits annually was sustainable when the Final EA was prepared in 2008:

If . . . we determine that *F. p. anatum* is no longer formally considered threatened or endangered by CWS in Canada, and if the Atlantic and Mississippi flyway councils have determined that peregrines from the Eastern management population no longer warrant special protection, the Service will consider transitioning from managing peregrines under Alternative 7 [the “preferred alternative” and the one ultimately chosen by FWS] to Alternative 8 [providing for harvest of up to 308 peregrines nationwide]. Based on analyses and the evaluation conducted in this [Final EA], we believe Alternative 8 is a safe, sustainable long-term approach for managing falconry harvest of peregrine falcons. Alternative 8 also has the advantage of being consistent with how the Service manages take for falconry of other raptors.

Final EA at 51. Elsewhere the Final EA notes that it is resistance from Canada and eastern flyways that has prevented the FWS from pursuing its management goal:

[Alternative 8, providing for 308 permits annually] could be implemented upon removal of the peregrine falcon from the Species At Risk list in Canada, and upon formal notification to the Service by both the Atlantic and Mississippi flyway councils that constraints to limit harvest of the Eastern management population are no longer necessary.

Final EA at 29. Sustainable levels of peregrine harvest have likely increased from 308 per year since the Final EA was published in 2008 due to the continually improving situation of the peregrine falcon. At any rate, FWS should act now to pursue its science-based policy of allowing take of one half of MSY up to 5 percent of annual production, rather than limiting it to 36 permits in the lower 48 states based on political concerns.

In addition, AFC has serious concerns about the “science” behind Canada’s opposition to increased passage peregrine capture, and is concerned that Canada’s position is, itself, not based on good science. In a February 2007 paper entitled *Update, COSEWIC Status Report on the Peregrine Falcon* (the “Canadian Peregrine Report”), prepared for the Committee On the Status of Endangered Wildlife in Canada (“COSEWIC”), which AFC has reason to believe has heavily influenced the Canadian opposition to enlarged passage peregrine capture, the authors themselves acknowledge the limitations on any conclusions drawn from their work.

- The Canadian Peregrine Report acknowledges that official population *estimates* are likely lower than actual population *numbers* because of limited ability to survey much breeding territory:

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“Although these surveys are not designed to determine abundance, they can provide an estimate of minimum population size.” Canadian Peregrine Report at iii.

“The national surveys, which are designed to collect population and productivity trend information, provide a minimum breeding population size only. This is because they occur at select sites so many areas are not surveyed. Many additional breeding pairs exist, especially Tundrius Peregrines Falcons that breed in vast, relatively uninhabited Arctic landscape.” Canadian Peregrine Report at 24-25.

“As mentioned earlier, population estimates based on national survey information will *underestimate* the total population of Peregrine Falcons.” Canadian Peregrine Report at 25 (emphasis added).

“These populations also have the potential to increase in size, given that other conditions, such as food supply, remain stable, because a number of historic sites remain unoccupied.” Canadian Peregrine Report at 25.

- Furthermore, Canadian population estimates are themselves based on highly questionable estimates of area of occupancy that likely significantly understate the true area of occupancy of all peregrine varieties:

“The area of occupancy (AO) for Anatum is estimated at 246,000 km<sup>2</sup>, for Tundrius at 52,000 km<sup>2</sup>, for a combined Anatum/Tundrius AO of 298,000 km<sup>2</sup>. . . . The AO for Anatum was calculated by multiplying the estimated average home range (500 km<sup>2</sup>, White et al. (2002)) by the number of occupied sites (492) in 2005. The AO for Tundrius was calculated by multiplying the estimated average home range of 500 km<sup>2</sup> by the number of territories (104) in 2005. The AO is much larger than this estimate, however, particularly for Tundrius, as many nest sites remain undiscovered.” Canadian Peregrine Report at 12.<sup>5</sup>

- The authors themselves noted that the more peregrine population surveyors looked for peregrine nests, the more they found, indicating that much of the unsearched nesting grounds likely contain more peregrines than thought based on the search efforts they conducted:

“In Canada, most areas with good survey effort have shown a substantial increase in Anatum and Tundrius Peregrine Falcons since 1970, with tremendous increases between 2000 and 2005 in some areas. . . . Increased search effort may also contribute somewhat to the increasing population trends.” Canadian Peregrine Report at 25-26.

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<sup>5</sup> In addition, there is ample evidence that food availability in a given area is a major influence on the proximity of nesting pairs. See Beebe, *The Marine Peregrines of the Northwest Pacific Coast*, The Condor, Vol. 62 No. 3, at 187-88 (May-June 1960). Accordingly, uncertainty about food availability throughout the large areas where Canadian authorities are estimating peregrine populations based on small samples of population densities in other areas makes those population estimates even more questionable.

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- The Report cites among its “limiting factors and threats” the “illegal harvest of eggs and nestlings for falconry.” Canadian Peregrine Report at iv. AFC questions the empirical basis for this conclusion. The availability of relatively inexpensive, domestically bred peregrines seriously mitigates any concerns over illegal harvest of eggs and nestlings, especially given the remote locations of most nests and the heavy penalties associated with illegal harvest.
- The study itself notes that any genetic distinction between tundrius and anatum peregrine falcons is weak and likely the result of man-made causes such as subsequent reintroduction to the wild of hybrids bred in captivity from non-native subspecies crossed with native North American subspecies. *See* Canadian Peregrine Report at 7-10. This “weak” genetic distinction was the basis of Canada’s finding that peregrine falcons still require legal protection as an imperiled species, but the U.S. has not (and should not) revise its peregrine classifications in accordance with this questionable finding.

Nonetheless, despite the abundance of peregrines available for capture in the U.S., high demand for permits, and the highly questionable bases for Canada’s opposition, FWS has recently stated a flat unwillingness to consider an increase in peregrine take permits. During a February 2011 telephone conference with the Atlantic Flyway Council – Nongame Technical Section, George Allen, the current Chief of the FWS Division of Migratory Bird Management Branch of Permits and Regulations and one of the authors of the Millsap and Allen study relied on by FWS, confirmed that FWS would not increase the number of available permits due to the Canadian opposition. It is time for FWS to stop elevating politics over science in its peregrine management policies. FWS should take regulatory action to provide take opportunities of one half of MSY up to five percent of annual production – the management goal set forth by FWS in its Final EA and supported by the best available science.

**II. The FWS should open areas west of 100 degrees west longitude to peregrine take pursuant to valid permits.**

Under the current management regime, passage peregrine take is approved only for the lower 48 states for the Eastern management population, *i.e.*, areas east of 100 degrees west longitude. AFC hereby petitions FWS to act to open the Western management population, *i.e.*, areas west of 100 degrees west longitude, to sustainable capture of passage peregrines for use in falconry.

Presently falconers in the lower 48 states west of 100 degrees west longitude may harvest nestling peregrines, but may not capture passage peregrines for falconry. However, in many areas in the Western U.S., this is not a reasonable option due to the difficulty of accessing peregrine nests, which often sit on high-altitude, remote cliff ledges and are extremely difficult and dangerous to access. Most falconers who would like the opportunity to capture a peregrine for use in falconry do not wish to climb cliff faces or dangerous rocks to access peregrine nests and should be able to receive permits for capture of passage peregrines. For this reason, few



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eyass peregrines have been harvested by falconers. In addition, many falconers prefer passage peregrines because they possess superior physical characteristics and hunting skills.

Furthermore, the fully recovered and still rapidly improving population of Western peregrines supports expanded take opportunities. Millsap and Allen's conclusion – advising a harvest limit of one half of MSY up to five percent of annual production – applies equally in the Western U.S. As the science supports such a limit throughout the lower 48 states, FWS should eliminate this arbitrary and unnecessary geographic limitation and allocate permits (increased from the current limit of 36, as set forth above) to the Western management population as well.

**III. Passage peregrine take permits should be allocated by FWS and/or the states like other raptor take permits, and not be subject to additional restrictions by the flyways.**

Take and possession of most raptors for use in falconry and propagation is regulated by FWS pursuant to 50 C.F.R. §§ 21.29 and 21.30. However, peregrine falcons are still treated as a special case, despite their full recovery and continued population increases. Accordingly, for peregrines, take permits are currently allocated by the Flyway Council. FWS should stop this unnecessary “special” treatment of peregrine permits, especially given the Flyway Council's failure to resolve its internal political differences, and develop a science-based allocation methodology. Instead, the FWS and/or FWS-approved states should issue peregrine take permits like all other raptor permits, pursuant to 50 C.F.R. §§ 21.29 and 21.30.

The flyway model for peregrine permit allocation has failed to produce a reasonable science-based allocation methodology, and has instead become mired in politics. In 2009 and 2010, allocation was made through agreement of the States participating in passage peregrine take for falconry purposes. *See* 74 Fed. Reg. 36,253 *et seq.* (Jul. 22, 2009); 75 Fed. Reg. 56,555 (Sept. 16, 2010). Political compromises during that process led to an allocation that distributed permits roughly equally between the participating States, rather than allocating them in favor of the areas most likely to result in a successful capture.<sup>6</sup> In fall 2010, the National Flyway Council formed a Peregrine Falcon ad hoc Committee to “assess the process through which passage Peregrine Falcon trapping/take permits have been allocated between flyways and to explore potential alternatives to the process that was used in the fall of 2009 and the fall of 2010.” *See* National Flyway Council Peregrine Falcon ad hoc Committee Report (Exhibit B). However, due

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<sup>6</sup> Many states that have been allocated permits under the current system are not located along peregrine migration routes, and therefore, even though issued permits by those states, many falconers attempting to capture passage peregrines in those states have not been successful. These largely useless permits should be reallocated to areas where there is a reasonable possibility of successful capture. Furthermore, AFC brings this to the FWS's attention to illustrate the fallacy of any counterargument to its rulemaking request that peregrines are not in high demand among falconers, as illustrated by the few falcons captured annually compared to the number of permits issued. The fact is not that falconers do not wish to take passage peregrines for use in falconry. The fact is that not only does the FWS unnecessarily limit the number of permits issued, but the Flyway Council's politics-based permit allocation methodology allocates a large number of the available permits to areas where the chance of a successful capture is nearly zero. The Flyway Council's failure to make the “hard choices” necessary to allocate take permits where they can be used and in so doing fulfill the FWS's goal stated in its Final EA has led directly to this state of affairs.

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largely to internal politics, the ad hoc Committee was unable to agree on the validity of migration data collected based on banding information, or any method of allocating passage peregrine take permits in a fashion designed to meet FWS's stated management goal of providing for take of one half of MSY up to five percent of annual production.

Instead, the ad hoc Committee endorsed an entirely arbitrary political compromise with no scientific basis whatsoever: its Alternative B allocates the 36 available passage peregrine take permits nationwide with one to each state participating in passage peregrine take, and the remaining permits allocated equally to each flyway with any leftover permits allocated by lottery. This approach ignores scientific evidence, disregards FWS's empirically based management goal, and makes no effort whatsoever to allocate permits in accordance with where passage peregrines are likely to be captured. FWS should reject the ad hoc Committee's choice of political compromise over science and regulate peregrine take pursuant to 50 C.F.R. §§ 21.29 and 21.30. Likewise, the FWS should reject any further allocation responsibility by "State agreement" as was used for the 2009 and 2010 allocations, as the States have shown themselves willing to put politics ahead of science.

**Conclusion**

For the reasons stated herein, AFC petitions FWS to increase the number of passage peregrine take permits available each year from 36 (the current level) up to the limit of one half of MSY up to five percent of annual production, in accordance with its identified management goal and the recommendation of Millsap and Allen. AFC further petitions FWS to expand the geographic scope of passage peregrine take to include portions of the lower 48 states west of 100 degrees west longitude. Finally, AFC petitions FWS to take over allocation of those permits from the Flyway Council and/or the States, which have shown a propensity for elevating politics over science in their allocation decisions, and to allocate permits in accordance with those locations where successful capture of passage peregrines has the greatest likelihood, taking into account both the quality of passage peregrine capture opportunities in the area and each State's willingness to allow passage peregrine harvest opportunities.

AFC is entitled to a timely, substantive response to this petition. *See American Horse Protection Ass'n, Inc. v. Lyng*, 812 F.2d 1, 4 (D.C. Cir. 1987); *Fund for Animals v. Norton*, 512 F. Supp. 2d 49, 54 (D.D.C. 2007). We look forward to receiving such a response. As always, AFC remains committed to responsible, scientific management of raptor take for falconry purposes and conservation of raptor species for future generations. We look forward to working cooperatively with the FWS to promote such goals.

Sincerely,

BIRCH, HORTON, BITTNER  
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