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March 12, 2013

Mr. Daniel M. Ashe, Director
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Subject: Falconry Eagle Harvest in Livestock Depredation Areas

Dear Director Ashe:

I am writing to you as President of the American Falconry Conservancy (AFC). The AFC was organized in 2002 for the purpose of protecting and preserving falconry in the U.S. for future generations and to protect falconers' rights as legitimate sportsmen. We are a non-profit organization dedicated to the art of hunting with trained raptors and it is our intention to pursue the broadest liberties possible that are not in conflict with legitimate science and conservation efforts.

We request your assistance in resolving issues surrounding current policies and provisions for licensed falconers to capture golden eagles in officially declared depredation areas, as authorized by Congress in the Bald and Golden Eagle Protection Act. Specifically, we request that the Service: 1) allow the state of Wyoming to administer the capture of eagles for falconry purposes; 2) reestablish an agreement with USDA/Wildlife Services in Wyoming to investigate, document and declare eagle depredation areas throughout the state; and 3) lift the falconry eagle capture quota of six golden eagles per year.

In 2008, the Service began turning over the administration of falconry to the individual states, under federal guidelines. These guidelines included the take of golden eagles for falconry purposes. Yet, the Service recently imposed a policy that only six eagles may be taken annually by falconers in depredation areas. This quota was based on the annual average number of eagles taken by falconers over a five-year period (2002-2007), a basis that is neither grounded in biology nor in law. At the same time, the Service has repeatedly documented that the sport of falconry has absolutely no environmental impact on the raptor resource. Therefore, the six-eagle quota is arbitrary, capricious and not grounded in science. This is in direct conflict with the Service allowing for hundreds of eagles to be "taken" by electrocution and wind turbines.

AFC respectfully reminds the Service that falconers have been allowed to capture eagles in depredation areas because eagle depredation on domestic livestock, primarily lambs, has been consistently documented in Wyoming (and in many other states throughout the American West) for several decades. Documentation of depredation has been published annually by USDA's National Agricultural Statistics Service.

In closing, AFC requests that the Service allow falconers to capture golden eagles in depredation areas without a quota and that the Service place the administration involving the capture of eagles in the hands of the state of Wyoming. AFC respectfully requests a written response from you concerning this matter in a timely manner, but no later than April 15th, as the 2013 eagle depredation season is fast approaching.

Sincerely,

Bill Meeker
President, AFC

cc: Scott Talbott, Director, Wyoming Game and Fish Dept.
Jason Fearneyhough, Director, Wyoming Dept. of Agriculture
Rod Krischke, State Director, USDA/Wildlife Services
Bryce Reece, Executive Vice President, Wyoming Wool Growers Assoc.
Dan McCarron, AFC Eagle Liaison