



MT Fish Wildlife & Parks
Attn. Wildlife-Peregrines
PO Box 200701
Helena, MT 59620-0701

January 12, 2007

Dear Commissioners:

The Flathead Audubon Society is a local, active group of people interested in sound stewardship and management of natural resources. We have reviewed the scoping letter for the proposal to take nestling peregrine falcons for falconry purposes and wish to submit the following comments.

Flathead Audubon Society feels the take of nestling peregrine falcons at this time is premature for reasons discussed below.

Although removed from the Endangered Species list, the species still is not numerous nor does it fully occupy suitable or historic habitat across the state. The uneven distribution needs to improve before any harvest begins as does the total population size. The 65 known pairs is still a very small wildlife population so taking any nestlings seems unwise at this time. If only 65 pairs of pheasants were left in Montana would the Commission be considering a hunting season on them?

Captive bred peregrines are readily available to falconers so there is no need for falconers to take wild peregrines at this time to engage in their sport.

Flathead Audubon Society is also concerned that this proposal has the appearance of privatization of a public wildlife resource since the group that would be authorized to take wild peregrines is very small and exclusive and the peregrines have a very high dollar value.

Criteria used to establish any authorized take of nesting peregrines should be developed by a diverse group of scientists and wildlife managers in an open, public manner with input from all interested parties. Flathead Audubon Society hesitates to include a laundry list of issues/criteria because a diverse group of scientists and wildlife managers would be best suited to develop the list. However, to illustrate some of our concerns we do offer the following issues/concerns: how to distribute take, frequency of take from any given nest, sex/age for take, number to leave in a nest, ownership/transferability/resale, adequacy and transparency of annual statewide monitoring, and regulation to promote further increases in population/distribution.

Flathead Audubon Society could potentially support the take of nestling peregrines at some point in the future when (1) the number and distribution of nesting peregrines improves, (2) the actual need to take wild peregrines is shown to be necessary for falconry, and (3) criteria insuring equitable and biologically sound management are developed by scientists and wildlife managers, not those who would be regulated by the developed rules and regulations.

Lewis Young
Conservation Committee Chair
Flathead Audubon Society
50 Garrison Drive
Eureka, MT 59917
406-889-3492