



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)

ITEM A
FWC Nov. 5, 2010
Meeting via conference call
page 1 of 15

The Office of Financial Management (OFM) has adopted this form for members of the public who wish to petition a state agency to adopt, amend, or repeal an administrative rule (regulation). Full consideration will be given to a petitioner's request.

Please complete the following:

PETITIONER'S NAME (PLEASE PRINT) Geoff Hirschi
TELEPHONE NUMBER (INCLUDE AREA CODE) (425) 315-3322
STREET ADDRESS 1226 167th Ave SE
PO BOX NUMBER
CITY Snohomish
STATE WA
ZIP CODE 98290
AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE Department of fish & Wildlife

Please submit completed and signed form to the "Rules Coordinator" at the appropriate state agency. The agency will contact you within 60 days.

Check all that apply below and explain on the back of this form with examples. Whenever possible, attach suggested language. You may attach other pages if needed.

1. NEW: I am requesting that a new WAC be developed.

I believe a new rule should be developed.

- The subject of this rule is:
The rule will affect the following people:
The need for the rule is:

2. AMEND: I am requesting a changing to existing WAC 232-30-152 (6)

3. REPEAL: I am requesting existing WAC be removed.

I believe this rule should be changed or repealed because (check one or more):

- It does not do what it was intended to do.
It imposes unreasonable costs.
It is applied differently to public and private parties.
It is not clear.
It is no longer needed.
It is not authorized. The agency has no authority to make this rule.
It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known:
It duplicates another federal, state or local law or rule. Please list number of the duplicate law or rule, if known:

Other (please explain): See attached document

PETITIONER'S SIGNATURE [Signature] DATE 9/16/10

On behalf of the Washington Falconers Association and its members, I would like to propose that the following language, which is largely equivalent to the federal falconry regulations, replace the existing language for WAC 232-30-152(6):

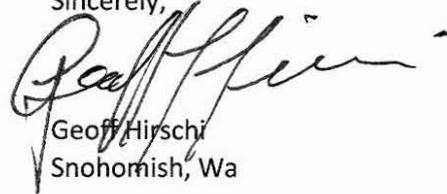
A General Falconer may take any species of Falconiform or Strigiform except a golden eagle, a bald eagle, a white-tailed eagle, Steller's sea-eagle, ferruginous hawk (*Buteo regalis*), Spotted owl (*Strix occidentalis*), hawk owl (*Surnia ulula*), or flammulated owl (*Otus flammeolus*).

We would like to make the following arguments in support of our request:

- Several scientific studies have assessed the impact of falconry take on wild raptor populations, most recently by the USFWS in 2007, and none could detect any impact at all due to falconry take.
- In testimony to the Commission when the current regulation was adopted at the meeting on August 6th, the Department Staff clearly affirmed that in his opinion there was **no** discernible impact on raptor populations due to falconry take.
- In spite of the lack of any biological impact, we agree with the department that it would be good policy to prohibit wild take on the raptor species where there is known biological concern with Washington's populations - specifically the ferruginous hawk (*Buteo regalis*), Spotted owl (*Strix occidentalis*), hawk owl (*Surnia ulula*), and the flammulated owl (*Otus flammeolus*).
- There is absolutely no biological justification for restricting general falconers from wild take of raptor species that they are allowed to take by federal regulations.
- Restricting general falconers from being allowed to take from the wild all the species that are allowed by the federal regulation, unless there are specific biological reasons for restricting take on a particular species, is contrary to the mandate of the Department and the Commission as codified in RCW 77.04.012:
"The commission shall attempt to maximize the public recreational game fishing and hunting opportunities of all citizens..."
- Allowing general falconers wild take of the all the species they are allowed by federal regulations will be consistent with the mandate of the Department and the Commission as codified in RCW 77.04.012:
"The department shall conserve the wildlife and food fish, game fish, and shellfish resources in a manner that does not impair the resource."
- In adopting the current regulation, the Commission has removed recreational access to three species, specifically northern harrier (*Circus cyaneus*), Swainson's hawk (*Buteo swainsoni*), and Rough-legged hawk (*Buteo lagopus*). Access to these species by falconers over the last several decades has never created any population concerns. By removing access to these three species, we believe the Commission has acted in violation of its mandate as codified in RCW 77.04.12.
- Switching from a "white list" approach which lists the species permitted for take to a "black list" approach which lists species that are *not* permitted for take makes the rule simpler to read by reducing its length and simpler to administer by the department.

- There are several examples of raptor species that were recently considered unsuitable for falconry because they were poorly understood. Some of these species are now considered indispensable to American falconry, as well as proving to be very valuable in abatement use. Among them are Harris' hawks, red-tail hawks, aplomado falcons, and American kestrels. Had provisions similar to the current state prohibitions existed where these species were first tried, their favorable characteristics might well have never been discovered.
- Falconry is fundamentally about the natural history experience between the falconer and the raptors being employed. There is no justification from restricting falconers from experiencing this natural history simply because the species they wish to experience do not have a tradition of being commonly used for falconry.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Hirschi". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Geoff Hirschi
Snohomish, Wa



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)

The Office of Financial Management (OFM) has adopted this form for members of the public who wish to petition a state agency to adopt, amend, or repeal an administrative rule (regulation). Full consideration will be given to a petitioner's request.

Please complete the following:

PETITIONER'S NAME (PLEASE PRINT) Geoff Hirschi			TELEPHONE NUMBER (INCLUDE AREA CODE) (425) 315-3322		
STREET ADDRESS 1226 167th Ave SE		PO BOX NUMBER	CITY Snohomish	STATE WA	ZIP CODE 98290
AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE Department of fish & Wildlife					

Please submit completed and signed form to the "Rules Coordinator" at the appropriate state agency. The agency will contact you within 60 days.

Check all that apply below and explain on the back of this form with examples. Whenever possible, attach suggested language. You may attach other pages if needed.

1. NEW: I am requesting that a new WAC be developed.

- I believe a new rule should be developed.**
- The subject of this rule is:
 - The rule will affect the following people:
 - The need for the rule is:

2. AMEND: I am requesting a changing to existing WAC 232-30-153 (5)

3. REPEAL: I am requesting existing WAC _____ be removed.

- I believe this rule should be changed or repealed because (check one or more):**
- It does not do what it was intended to do.
 - It imposes unreasonable costs.
 - It is applied differently to public and private parties.
 - It is not clear.
 - It is no longer needed.
 - It is not authorized. The agency has no authority to make this rule.
 - It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known:
 - It duplicates another federal, state or local law or rule. Please list number of the duplicate law or rule, if known:

Other (please explain): **See attached document**

PETITIONER'S SIGNATURE 	DATE 9/16/10
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On behalf of the Washington Falconers Association and its members, I would like to propose that the following language, which is largely equivalent to the federal falconry regulations, replace the existing language for WAC 232-30-153(5):

(5) A Master Falconer may take any species of Falconiform or Strigiform except a bald eagle, ferruginous hawk (*Buteo regalis*), Spotted owl (*Strix occidentalis*), hawk owl (*Surnia ulula*), or flammulated owl (*Otus flammeolus*).

We would like to make the following arguments in support of our request:

- Several scientific studies have assessed the impact of falconry take on wild raptor populations, most recently by the USFWS in 2007, and none could detect any impact at all due to falconry take.
- In testimony to the Commission when the current regulation was adopted at the meeting on August 6th, the Department Staff clearly affirmed that in his opinion there was **no** discernible impact on raptor populations due to falconry take.
- In spite of the lack of any biological impact, we agree with the department that it would be good policy to prohibit wild take on the raptor species where there is known biological concern with Washington's populations - specifically the ferruginous hawk (*Buteo regalis*), Spotted owl (*Strix occidentalis*), hawk owl (*Surnia ulula*), and the flammulated owl (*Otus flammeolus*).
- There is absolutely no biological justification for restricting master falconers from wild take of raptor species that they are allowed to take by federal regulations.
- Restricting master falconers from being allowed to take from the wild all the species that are allowed by the federal regulation, unless there are specific biological reasons for restricting take on a particular species, is contrary to the mandate of the Department and the Commission as codified in RCW 77.04.12:
"The commission shall attempt to maximize the public recreational game fishing and hunting opportunities of all citizens..."
- Allowing master falconers wild take of the all the species they are allowed by federal regulations will be consistent with the mandate of the Department and the Commission as codified in RCW 77.04.12:
"The department shall conserve the wildlife and food fish, game fish, and shellfish resources in a manner that does not impair the resource."
- In adopting the current regulation, the Commission has removed recreational access to three species, specifically northern harrier (*Circus cyaneus*), Swainson's hawk (*Buteo swainsoni*), and Rough-legged hawk (*Buteo lagopus*). Access to these species by falconers over the last several decades has never created any population concerns. By removing access to these three species, we believe the Commission has acted in violation of its mandate as codified in RCW 77.04.12.
- Switching from a "white list" approach which lists the species permitted for take to a "black list" approach which lists species that are *not* permitted for take makes the rule simpler to read by reducing its length and simpler to administer by the department.

- There are several examples of raptor species that were recently considered unsuitable for falconry because they were poorly understood. Some of these species are now considered indispensable to American falconry, as well as proving to be very valuable in abatement use. Among them are Harris' hawks, red-tail hawks, aplomado falcons, and American kestrels. Had provisions similar to the current state prohibitions existed where these species were first tried, their favorable characteristics might well have never been discovered.
- Falconry is fundamentally about the natural history experience between the falconer and the raptors being employed. There is no justification from restricting falconers from experiencing this natural history simply because the species they wish to experience do not have a tradition of being commonly used for falconry.

Sincerely,



Geoff Hirschi
Snohomish, Wa



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)

The Office of Financial Management (OFM) has adopted this form for members of the public who wish to petition a state agency to adopt, amend, or repeal an administrative rule (regulation). Full consideration will be given to a petitioner's request.

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AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE Department of fish & Wildlife					

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Check all that apply below and explain on the back of this form with examples. Whenever possible, attach suggested language. You may attach other pages if needed.

1. NEW: I am requesting that a new WAC be developed.

I believe a new rule should be developed.

- The subject of this rule is:
- The rule will affect the following people:
- The need for the rule is:

2. AMEND: I am requesting a changing to existing WAC 232-30-151 (7)

3. REPEAL: I am requesting existing WAC _____ be removed.

I believe this rule should be changed or repealed because (check one or more):

- It does not do what it was intended to do.
- It imposes unreasonable costs.
- It is applied differently to public and private parties.
- It is not clear.
- It is no longer needed.
- It is not authorized. The agency has no authority to make this rule.
- It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known:
- It duplicates another federal, state or local law or rule. Please list number of the duplicate law or rule, if known:
- Other (please explain): **See attached Document**

PETITIONER'S SIGNATURE 	DATE 9/16/10
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On behalf of the Washington Falconers Association and its members, I would like to propose that the following language, which is exactly equivalent to the federal falconry regulations, replace the existing language for WAC 232-30-151(7):

An apprentice falconer may take a raptor of any Falconiform or Strigiform species except the following: American swallow-tailed kite (*Elanoides forficatus*), bald eagle (*Haliaeetus leucocephalus*), white-tailed eagle (*Haliaeetus albicilla*), Steller's sea-eagle (*Haliaeetus pelagicus*), northern harrier (*Circus cyaneus*), Swainson's hawk (*Buteo swainsoni*), ferruginous hawk (*Buteo regalis*), golden eagle (*Aquila chrysaetos*), peregrine falcon (*Falco peregrinus*), prairie falcon (*Falco mexicanus*), flammulated owl (*Otus flammeolus*), burrowing owl (*Athene cunicularia*), spotted owl (*Strix occidentalis*), hawk owl (*Surnia ulula*), and short-eared owl (*Asio flammeus*).

We would like to make the following arguments in support of our request:

- Several scientific studies have assessed the impact of falconry take on wild raptor populations, most recently by the USFWS in 2007, and none could detect any impact at all due to falconry take.
- In testimony to the Commission when the current regulation was adopted at the meeting on August 6th, the Department Staff clearly affirmed that in his opinion there was **no** discernible impact on raptor populations due to falconry take.
- There is absolutely no biological justification for restricting apprentice falconers from wild take of raptor species that they are allowed to take by federal regulations. The take by apprentice falconers is no more significant, biologically, than the take by other classes of falconers.
- Restricting apprentice falconers from being allowed to take from the wild all the species that are allowed by the federal regulation, unless there are biological reasons for restricting take on a particular species, is contrary to the mandate of the Department and the Commission as codified in RCW 77.04.012:
"The commission shall attempt to maximize the public recreational game fishing and hunting opportunities of all citizens..."
- Allowing apprentice falconers wild take of the all the species they are allowed by federal regulations will **not** be contrary to the mandate of the Department and the Commission as codified in RCW 77.04.012:
"The department shall conserve the wildlife and food fish, game fish, and shellfish resources in a manner that does not impair the resource."
- Switching from a "white list" approach which lists the species permitted for take to a "black list" approach which lists species that are *not* permitted for take makes the rule simpler to read and administer.
- There are several examples of raptor species that were recently considered unsuitable for falconry because they were poorly understood. Some of these species are now considered indispensable to American falconry. Among them are Harris' hawks, red-tail hawks, aplomado falcons, and American kestrels. Had provisions similar to the current state prohibitions existed where these species were first tried, their favorable characteristics might well have never have been discovered.

- Falconry is fundamentally about the natural history experience between the falconer and the raptors being employed. There is no justification from restricting falconers from experiencing this natural history simply because the species they wish to experience do not have a tradition of being commonly used for falconry.

Sincerely,

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Geoff Hirschi
Snohomish, Wa



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)

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STREET ADDRESS 1226 167th Ave SE		PO BOX NUMBER	CITY Snohomish	STATE WA	ZIP CODE 98290	

AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE
Department of fish & Wildlife

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Check all that apply below and explain on the back of this form with examples. Whenever possible, attach suggested language. You may attach other pages if needed.

1. NEW: I am requesting that a new WAC be developed.

I believe a new rule should be developed.

- The subject of this rule is:
- The rule will affect the following people:
- The need for the rule is:

2. AMEND: I am requesting a changing to existing WAC 232-30-510(s)

3. REPEAL: I am requesting existing WAC _____ be removed.

I believe this rule should be changed or repealed because (check one or more):

- It does not do what it was intended to do.
- It imposes unreasonable costs.
- It is applied differently to public and private parties.
- It is not clear.
- It is no longer needed.
- It is not authorized. The agency has no authority to make this rule.
- It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known:
- It duplicates another federal, state or local law or rule. Please list number of the duplicate law or rule, if known:
- Other (please explain): **see attached document**

PETITIONER'S SIGNATURE 	DATE 9/16/10
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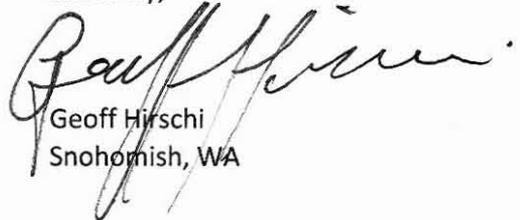
On behalf of the Washington Falconers Association and its members, I would like to propose that the following language replace the existing language for WAC 232-30-510(5):

(5) Wild-caught raptors taken in Washington or outside of Washington may be used for propagation purposes. Progeny may be offered for sale or trade.

We would like to make the following arguments in support of our request:

- Extensive public comment delivered at the June 4th Commission meeting was universally in support of allowing the sale of the progeny of wild taken raptors.
- Comments received by the Department from the public during the comment period were likewise universally in support of allowing the sale of wild progeny.
- Sale of the progeny of wild taken raptors does not constitute commercialization of live wildlife. The wild raptors will **not** be commercialized. Only their progeny, which are defined within the adopted WACs as “captive bred raptors”, will be commercialized.
- Raptor propagation is an expensive and time consuming endeavor. The sale of the progeny of wild taken raptors encourages raptor propagators to breed raptors taken from Washington by allowing them to recover some of their costs. This will reduce the impact on wild raptors and provide a genetic reserve in case of difficulty with the wild populations.
- At present, Washington is the only state that prohibits the sale of the progeny of wild taken raptors. **Every** other state which allows the captive propagation of raptors and allows wild take of raptors allows the sale of the progeny of those raptors.
- There is absolutely no biological basis for prohibiting the sale of the progeny of wild taken raptors. In fact the *biological* argument is overwhelming in support of the sale of the progeny of wild taken raptors.

Sincerely,



Geoff Hirschi
Snohomish, WA



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)

B, cont'd
RECEIVED
OCT 15 2010
WILDLIFE COMMISSION

The Office of Financial Management (OFM) has adopted this form for members of the public who wish to petition a state agency to adopt, amend, or repeal an administrative rule (regulation). Full consideration will be given to a petitioner's request.

Please complete the following:

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STREET ADDRESS 1226 167th Ave SE	PO BOX NUMBER	CITY Shobomish WA	STATE WA
AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE Department of fish & wild life			ZIP CODE 98290

Please submit completed and signed form to the "Rules Coordinator" at the appropriate state agency. The agency will contact you within 60 days.

Check all that apply below and explain on the back of this form with examples. Whenever possible, attach suggested language. You may attach other pages if needed.

1. NEW: I am requesting that a new WAC be developed.

I believe a new rule should be developed.

- The subject of this rule is:
- The rule will affect the following people:
- The need for the rule is:

2. AMEND: I am requesting a changing to existing WAC 232-12-064 (S)

3. REPEAL: I am requesting existing WAC _____ be removed.

I believe this rule should be changed or repealed because (check one or more):

- It does not do what it was intended to do.
- It imposes unreasonable costs.
- It is applied differently to public and private parties.
- It is not clear.
- It is no longer needed.
- It is not authorized. The agency has no authority to make this rule.
- It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known: WAC 232-30-244
- It duplicates another federal, state or local law or rule. Please list number of the duplicate law or rule, if known:
- Other (please explain): see attached document.

PETITIONER'S SIGNATURE 	DATE 10/15/10
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Geoff Hirschi
1226 167th Ave SE
Snohomish, WA 98290
October 15, 2010

RECEIVED
OCT 15 2010
FISH AND
WILDLIFE COMMISSION

Fish and Wildlife Commission
Washington Department of Fish and Wildlife
600 Capitol Way N.
Olympia, WA 98501-1091

On behalf of the Washington Falconers Association and its members, I would like to propose that the following language replace the existing language for WAC 232-16-064(5):

(5) Live wild animals, wild birds, or game fish held in captivity, or their progeny or parts thereof, may not be sold or otherwise used commercially except as provided in WAC 232-30 or otherwise provided by rule of the commission.

We would like this rule change to be considered in conjunction with the request that we made via a Petition for Adoption, Amendment or Repeal of a State Administrative Rule that was submitted to the Commission on September 16th in order to request a change to WAC 232-30-510(5).

We make this request because of recent problems that the falconry community has had with the Department reinterpreting this regulation and how it should be applied.

This rule was already in place when the Commission authorized the sale of captive bred raptors by licensed raptor propagators in the mid 80's. The action of the Commission authorizing the sale of captive bred raptors was a "rule of the commission", yet in 2002 the Department reinterpreted this rule and decided it prohibited Washington State raptor propagators from using raptors taken from the wild in Washington for propagation because the sale of their progeny would constitute "commercialization" and would therefore be in violation of 232-16-064(5). Prior to this, there had been a long history of the Department supporting the use of raptors taken from the wild in Washington for raptor propagation. The very first permits issued in Washington to allow raptor propagation were used to breed prairie falcons which were taken from the wild in the Yakima area.

We believe that making this minor change to 232-16-064(5) would prevent any future incidents of administrators within the Department from reinterpreting the WACs passed by the Commission which authorize the sale of captive bred raptors

Sincerely,



Geoff Hirschi
Director,
Washington Falconers Association



**PETITION FOR ADOPTION, AMENDMENT, OR REPEAL
OF A STATE ADMINISTRATIVE RULE (RCW 34.05.330)**

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RECEIVED
OCT 15 2010

Please complete the following:

FISH AND
WILDLIFE COMMISSION

PETITIONER'S NAME (PLEASE PRINT) Geoff Hirschi		TELEPHONE NUMBER (INCLUDE AREA CODE) (425) 315-3322	
STREET ADDRESS 1226 167th Ave SE	PO BOX NUMBER	CITY Shobomish WA	STATE WA
AGENCY RESPONSIBLE FOR ADMINISTERING THE RULE Department of fish & wild life			ZIP CODE 98290

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1. NEW: I am requesting that a new WAC be developed.

I believe a new rule should be developed.

- The subject of this rule is:
- The rule will affect the following people:
- The need for the rule is:

2. AMEND: I am requesting a changing to existing WAC **232-12-064 (6)**

3. REPEAL: I am requesting existing WAC be removed.

I believe this rule should be changed or repealed because (check one or more):

- It does not do what it was intended to do.
- It imposes unreasonable costs.
- It is applied differently to public and private parties.
- It is not clear.
- It is no longer needed.
- It is not authorized. The agency has no authority to make this rule.
- It conflicts with another federal, state, or local law or rule. Please list number of the conflicting law or rule, if known: **WAC 232-30-242**
- It duplicates another federal, state or local law or rule. Please list number of the duplicate law or rule, if known:

Other (please explain): **see attached document**

PETITIONER'S SIGNATURE Geoff Hirschi	DATE 10/15/10
--	-------------------------

Geoff Hirschi
1226 167th Ave SE
Snohomish, WA 98290
October 15, 2010

RECEIVED
OCT 15 2010

FISH AND
WILDLIFE COMMISSION

Fish and Wildlife Commission
Washington Department of Fish and Wildlife
600 Capitol Way N.
Olympia, WA 98501-1091

On behalf of the Washington Falconers Association and its members, I would like to propose that the following language replace the existing language for WAC 232-16-064(6):

(6) No wildlife shall be released from captivity except as provided in WACs 232-12-271 and 232-30-242, except that it is lawful to return to the waters from which caught, game fish caught and subsequently kept alive on stringers, in live wells, or in other containers while fishing. The release of fish into any waters of the state, including private, natural, or man-made ponds, requires a fish planting permit.

As currently adopted, WAC 232-16-064 contradicts the falconry regulations that were adopted by the Commission in August which allow falconers to release back to the wild certain raptors that they are holding for falconry. We believe that this was simply an oversight on the part of the Department Staff which handled the overhaul of the falconry regulations, and it was something that the falconry community did not notice until very recently.

Sincerely,



Geoff Hirschi
Director,
Washington Falconers Association