



# Audubon CONNECTICUT



Connecticut  
**Audubon Society**

CONNECTICUT  
ORNITHOLOGICAL  
ASSOCIATION



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ENVIRONMENT COMMITTEE PUBLIC HEARING  
February 9, 2011

TESTIMONY SUBMITTED ON BEHALF OF

AUDUBON CONNECTICUT  
CONNECTICUT AUDUBON SOCIETY  
CONNECTICUT ORNITHOLOGICAL ASSOCIATION

BY

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AUDUBON CONNECTICUT

*IN OPPOSITION TO: S.B. 837 AN ACT CONCERNING FALCONRY*

Senator Meyer, Representative Roy and members of the Environment Committee, on behalf of Audubon Connecticut, the state organization of the National Audubon Society, I am submitting testimony today in **strong opposition** to S.B. 837, An Act Concerning Falconry, which would allow the capture and taking of immature red-tailed hawks from the wild for use in falconry. This testimony today is offered on behalf of Connecticut Audubon Society, one of the oldest bird conservation organizations in the nation, and the Connecticut Ornithological Association, a statewide group dedicated specifically to Connecticut's birds, birders, and birding, in addition to Audubon Connecticut.

Collectively, our mission is to protect wild birds in Connecticut. Reduction of the protections afforded these birds runs counter to this mission. We have no objection to the practice of falconry, however, we cannot support efforts to reduce the amount of protection provided wild birds in order to make them available for personal use. Many species of raptors are readily available for purchase from captive breeding facilities, and the taking of birds from the wild is unnecessary other than for the situation of apprentice falconers.

Connecticut is a small, densely populated state and we have concerns about taking of wild birds into captivity. If protective rules are to be loosened, we must set a high standard for this to occur. There must be peer reviewed scientific data to support the assertion that wild populations red-tailed hawks will not be impacted by such activities at **current or future levels.**

We have several specific concerns with the take of wild raptors including:

1. **Enforcement issues.** Many state wildlife agencies whose task it is to administer falconry programs have had to expend disproportionate efforts in doing so. Allowing the take of wild red-tailed hawks will greatly increase the complexity of enforcing the regulations on falconry in Connecticut. Our state currently ranks among the lowest in the nation in terms of per capita spending on non-game wildlife programs. The additional resources necessary for the proper enforcement of these regulations will reduce the ability of the already under-funded wildlife division of the Department of Environmental Protection to perform existing responsibilities. While it is certainly true that most hunting activities more than pay for themselves through fees and taxes, the fees and licensing of falconry will not come close to covering this added expense. The added expenses and additional resources necessary for the enforcement of regulations would add costs to the taxpayers, while benefiting only a small group of citizens.

Rigorous enforcement of falconry take regulations is necessary due to the high value some of these species have on the **worldwide black market**. In 1984, there was an operation that involved 150 Federal U.S. Fish and Wildlife Service special agents and an equal number of state wildlife officers. A large number of live raptors were seized (including Arctic Gyrfalcons and 140 endangered peregrines) as well as cars, trucks, and airplanes that the federal government charged were used in a "worldwide, multimillion-dollar illegal black market in birds of prey". Thirty-nine falconers in 14 states were charged with 80 felony counts of illegally dealing in raptors. According to the falconers' own records, more than 500 hawks and falcons had been illegally taken from the wild. Half of these captured birds died during handling and trading. Unscrupulous falconers have stolen eggs and chicks (called eyasses) from the wild and then sold them as captive bred. The banding and recordkeeping system the Fish and Wildlife Service set up to prevent this was apparently quite easy to circumvent.

2. **Research needs.** Little is known about the status of raptors in Connecticut, including red-tailed hawks. Information is lacking on factors such as the effective breeding population size, the relationship of Connecticut's breeding raptors to regional populations, average life span, mortality rate and survivorship of different age groups, productivity, and reproductive rate. This legislation aims to allow the trapping of "immature" or passage birds during their first year migration. We do not possess the data to fully understand whether or not removing these birds would have any impact on local or regional populations. We are also unaware of any data indicating that removing these birds from the wild for use in falconry would (as has been suggested) have any significant impact on their subsequent survival when – or if – they are released back to the wild. The legislation as drafted does not require that birds taken from the wild be released after a period of time and does not define what is meant by "immature" birds. As stated above, stronger regulations and enforcement capability would be needed to ensure that any guidelines are followed. Our groups **unequivocally oppose** any taking of wild raptors from the nest. We must have sound scientific evidence that the trapping of wild red-tailed hawks would not adversely impact populations of these birds or their prey before any such activity is allowed.
3. **Potential for negative impacts on hawk populations.** While the small-scale activity of falconry generally does not have much effect on populations of raptors on a wide scale, this may not be true with local populations of birds where there are high

concentrations of falconers. For example, in three (Peregrine Falcon) eyeries in the lower Hudson, 33 young hatched during the six years 1943 through 1948, or 1.83 per eyerie. Eighteen of these young, or 54% were taken from the nest ledges by falconers. (Source Richard and Kathleen Herbert, Peregrine Falcon Population, their Biology and Decline. 1969. University of Wisconsin Press.) In a small highly populated state such as Connecticut, there is certainly potential for increased popularity of falconry leading to higher concentrations of falconers in the state and increased stresses on our raptor populations. Who and how will we determine how many red-tailed hawks it is acceptable to remove from the wild? What will happen if Connecticut adopts reciprocal falconry licenses with other states, thereby allowing falconers from other states to take Connecticut birds?

4. **Trapping methods.** Pursuit, capture, and harassment of wild birds are prohibited under the federal Migratory Bird Treaty Act. Though some trapping methods are more species-specific than others, there are no provisions in this legislation for determining which trapping methods are most effective and which have the least negative impact on birds. If the capture of wild red-tailed hawks is allowed, there would be no assurances that only these hawks (the allowed species) would be captured and that other species would not be harassed or inadvertently injured.

We urge the Environment Committee to **oppose** S.B. 837. We appreciate your thoughtful consideration of this matter and our groups are willing to meet with the members of the Environment Committee, the Sportsmen Caucus, the Department of Environmental Protection and falconry stakeholders to discuss our concerns further.

Please note that though we are opposed to the wild take provisions of S.B. 837, we have **no position regarding Sunday hunting** by falconers.

Thank you for the opportunity to comment on this issue.

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