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[EXTERNAL] 1018-Falconry Comment from John M Goodell

John Goodell <jfiskegoodell@gmail.com>   Thu, Aug 22, 2019 at 12:13 PM
To: Info_Coll@fws.gov

TO Whom it May Concern,

I am a licensed master falconer and wildlife biologist, and am writing to comment on the proposed new database. To answer some questions:

 1. Is the database necessary to the proper functions of the Service?" In collaboration with the States, the Service should be monitoring falconry take to ensure that take does not exceed 5% as recommended by the USFWS in Millsap and Allen 2006.

2. "Will this information be processed and used in a timely manner?" My suspicion in talking with some agency biologists is that there is essentially zero capacity at the state level to monitoring these databases for accuracy, compliance, or take levels among other reasons. So the existence of the system itself is possibly unjustified. There seems to be no funding or time within the agencies to look a this information. Since falconers are already submitting annual reports to their state F&W agency every year, they are, in effect, submitting duplicate records for no reason. I would contend that falconer reporting is an onerous requirement as currently managed and even more so since the agencies dont look at the information anyway.

3, "How might the Service enhance the quality, utility, and clarity of the information to be collected?" The system should replace annual reporting at the state level and should be highly user-friendly. Due to the dysfunction of the last system, a lot of people were just submitting paper copies anyway to their state falconry staff person. The problems had to do with permit number formatting where the fields did not clearly set the format of entry. Also, many birds are transferred between some state permits and some other federal permits like propagation, abatement, or other. or to or from out of state, state falconry permits that the system sometimes didn't recognize and allow. In general the system did not recognize some other valid permit types that related to falconry transfers. Also each user account did not save a database for the permittee. The system should work both ways...to give info to the agency while maintaining a safe and accurate database of record submissions for each permittee.

4." How might the Service minimize the burden of this collection on the respondents?" Advise states that an annual report requirements are being met by the database reporting system and are thus unnecessary. Make the database idiot-proof and make sure it is formatted to allow transfer and acquisitions between all possible legal permit types. Make sure the database serves the permittee by saving all submissions and allowing the permittee to search and print all past submissions easily. Increase the length of time a permittee has to report a transfer or acquisition to make it less likely that violations are a matter of plain forgetting. To add to that, maybe link the transfers, so that when one permittee fills out a transfer on the database, it will prompt that other involved permittee by email "Joe has submitted his 3-186, click here to submit yours by X date". This would keep reporting accurate and keep folks out of trouble ten fold. Im sure the Service doesn't want to pursue enforcement based on someone losing track of paperwork when they are submitting a lot of forms every year and forget one.

Cheers, J