

**AMERICAN FALCONRY CONSERVANCY****COMMENTS ON PROPOSAL 174 – 5 AAC 92.037: PERMITS FOR FALCONRY****MARCH 14, 2014**

The American falconry conservancy (AFC) finds Proposal 174; Permits for falconry to be an excellent basis for the State of Alaska to allow and regulate non-resident take of raptors for falconry use. However, we feel that it is important to add the following comments regarding this proposed regulation.

- 1) AFC believes that any non-resident falconry take provisions in Alaska should include the opportunity for non-residents to capture nestling raptors. The advice given to the board by Assistant A.G. Kevin Saxby clearly states that limitations placed on non-residents cannot differ from those placed on residents unless there is a particular harm created by the non-residents which is not created by residents. Virtually all states that currently allow non-resident take of raptors for falconry purposes allow the harvest of nestling and passage raptors. These non-resident harvest provisions have caused on harm to the resource. or regulatory problems.
- 2) AFC believes that it is especially important to point out that virtually all states that allow harvest of nestling anatum peregrines include provisions for permits reserved specifically for non-resident falconers. Federal guidelines set nestling anatum peregrine harvest limits at 5% of the annual number of young produced. For example, Wyoming currently allots 5 capture permits and reserves 1 for non-residents. Utah allows 8 permits and reserves two for non-residents. Additionally, most states allow any permits not claimed in the initial annual drawing to be purchased over the counter by resident or non-resident falconers on a first come basis. Similar provisions are also made by virtually all states that allow capture of immature migrant peregrines in the fall. States in the lower 48 that allow peregrine harvests have several times as many falconers as they do capture permits. Despite the relatively small number of capture permits relative to the number of resident falconers, these non-resident take provisions for peregrines , as well as for other species, have been put in place at the insistence of the resident falconers.
- 3) If harvest quotas for falconry harvests were set at 55 of annual production for gyrfalcons and peregrines in Alaska, the number of available raptors would exceed the total number of resident falconers by a factor of several times, a situation completely different from virtually any other state that allows non-resident harvest of falconry raptors. Annual production numbers for both peregrines and gyrfalcons in Alaska would result in harvest limits of approximately 50 to 60 individuals of each species per year. AFC believes that proposals to limit harvest numbers for each species to artificially low numbers without sound biological justification is indefensible. We urge that the Department set conservative, but realistic harvest limits for each species of raptor based on a sustainable 5% harvest rate, and allow harvests up to those limits if demand exists. From a biological management perspective, it does not matter wither the raptors are captured by residents or non-residents.
- 4) Not only do Alaskan falconers travel to the lower 48 states to trap raptors, many Alaskan falconers travel south to hunt with their trained raptors. Many of these falconers concentrate their hunting activities on sage and prairie grouse. While the raptors non-residents seek to harvest in Alaska (primarily gyrfalcons and peregrines) have healthy robust populations, the native prairie and sage grouse are either active candidates for listing s endangered species, or at best represent declining populations currently at levels reduced to virtual remnants of the numbers seen 30 years ago. The resident falconers fortunate enough to be living in the areas where these unique and wonderful grouse still occur in numbers sufficient to warrant pursuing them recognize that Alaskan resident falconers are also entitled to the opportunity to pursue these highly desirable quarry species.

By: Lee Grater, President of AFC

5) Some commenters have expressed concerns regarding the possibility that raptors removed from Alaska, or their progeny will be trafficked internationally at very high prices. AFC believes that there is in fact very little possibility of this happening. Under federal and state regulations the individuals raptors removed from the wild in Alaska can never be sold or trafficked commercially. Under the current policies adopted by the US F&WS any raptor propagator wishing to export an Appendix 1 species (gyrfalcons and peregrines) would be limited to exporting only captive bred progeny, and only after obtaining registry under Part 23.23.46 as a commercial breeder with the CITES Secretariat, a very complicated process that takes 1 ½ to 2 years to complete. Any raptors harvested in Alaska by non-resident falconers will be almost exclusively restricted to domestic use by American residents. The large majority of any subsequent legal trade in captive bred offspring originating from Alaskan stock would be limited to the American domestic falconry market, and traded at modest prices that may not cover the cost of production.

6) There are two primary reasons non-resident falconers would seek to come to Alaska to harvest wild raptors:

i) There is a considerable appeal to individual falconers to experience the thrill of visiting Alaska and experiencing truly wilderness landscapes. This is just as true for falconers as for fishermen or hunters. I can fish for trout in Oklahoma, but I still dream of having the opportunity to do so in Alaska.

ii) There is a real need to add to or diversify the genetics of the captive populations of raptors being bred for use in falconry. This is especially true of peregrines; the current population of captive peregrines have descended from a very limited number of founding individuals and are now significantly inbred.

7) AFC believes that should the Board see fit to adopt Proposal 174, it would be necessary to also make changes to the Alaska falconry regulations relating to the export of wild captured raptors by residents, and also to remove any prohibitions on the export of captive bred progeny which would unfairly impact resident falconers or propagators.

The American Falconry Conservancy thanks the board for their consideration of this matter which we believe is of significant importance to the practice of the art of falconry in America. We would also like to remind the board that the United Nations has formally recognized the practice of falconry as an important historical human cultural achievement. It is our sincere hope that Alaska will welcome non-resident falconers to their state to fully enjoy the states bountiful raptor resources. Again, AFC thanks the board for their consideration, and we continue to offer our assistance in this important matter.