



AMERICAN ★ FALCONRY
CONSERVANCY

April 24, 2015

Alaska Board of Game
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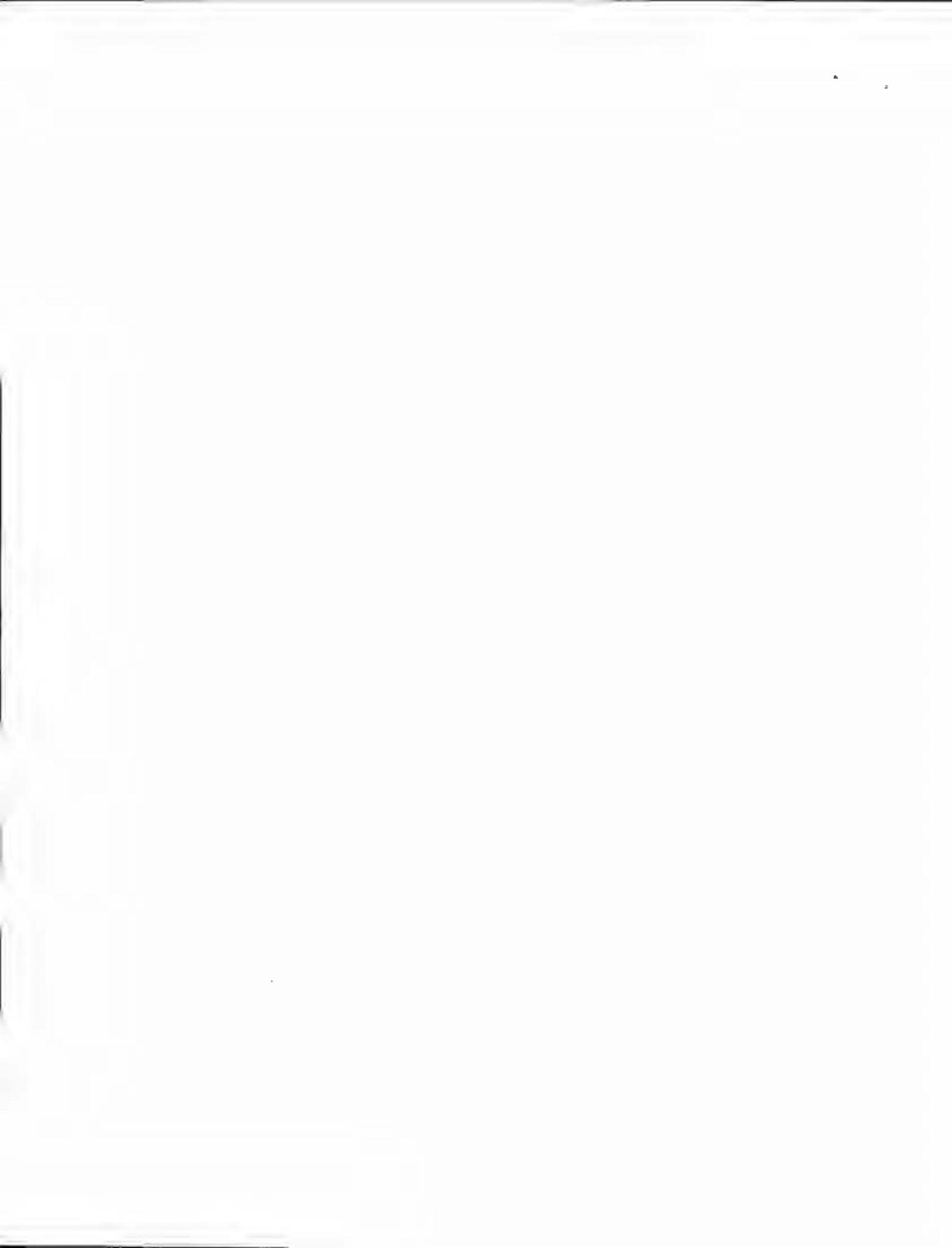
Subject: Proposal to increase the allowable harvest of raptors by nonresident falconers

This proposal is a request to modify existing Alaska provisions regulating nonresident harvest of raptors in order to ensure reasonable access to a healthy resource, and provide equal opportunity for all interested parties. We anticipate the following will fulfill falconry demand for the foreseeable future while remaining well below sustainable harvest numbers consistent with scientifically sound principles:

- 20-30 nestling (“eyass”) or juvenile (“passage,” i.e., first year immature birds) peregrine falcons
- Allow non-residents to take eyass as well as passage birds of all falconry related raptors with no quotas;
- Adopt the same raptor take season for non-residents as has been adopted for Alaska residents.
- Bag limit of two birds. Birds with quotas should be limited to one tag per applicant, after the draw period is over any unissued tags should be available at the counter on a first come first serve basis.

Arguably the most desirable falcon for nonresident take is the peregrine falcon. Alaskan populations have always been robust and since the anatum subspecies was removed from the endangered species list in 1999 it is considered fully recovered beyond all expectations throughout the US. As a result the USFWS conducted an Environmental Assessment (EA) on the take of peregrine falcons for use in falconry. The EA published a very conservative allocation of take of peregrines in 2009. The EA, which was agreed to by the states, allows for the harvest of 41 in Alaska of which only a small percentage are harvested each year.

In order to provide maximum opportunity for both resident and nonresident falconers we propose a minimum of 20 nonresident permits plus the following method of selection for the distribution of additional permits that are unwanted by resident falconers: :



- Multiply by 2 the average quantity annually harvested by resident falconers over the prior three years.
- Deduct the number above from the allowable harvest of 41 and this would be the number of permits available to nonresident falconers.

The proposed non-resident take level for peregrines is a very conservative number and the harvest of this quantity is far below any measurable amount. The other more desirable raptor is the gyrfalcon which has never been endangered or threatened and is plentiful in Alaska, thus we believe no quota is necessary. Should a quota be required on the gyrfalcon for nonresident harvest we believe that 40 would be sufficient to satisfy the demand given the limited number of licensed falconers in the lower 48.

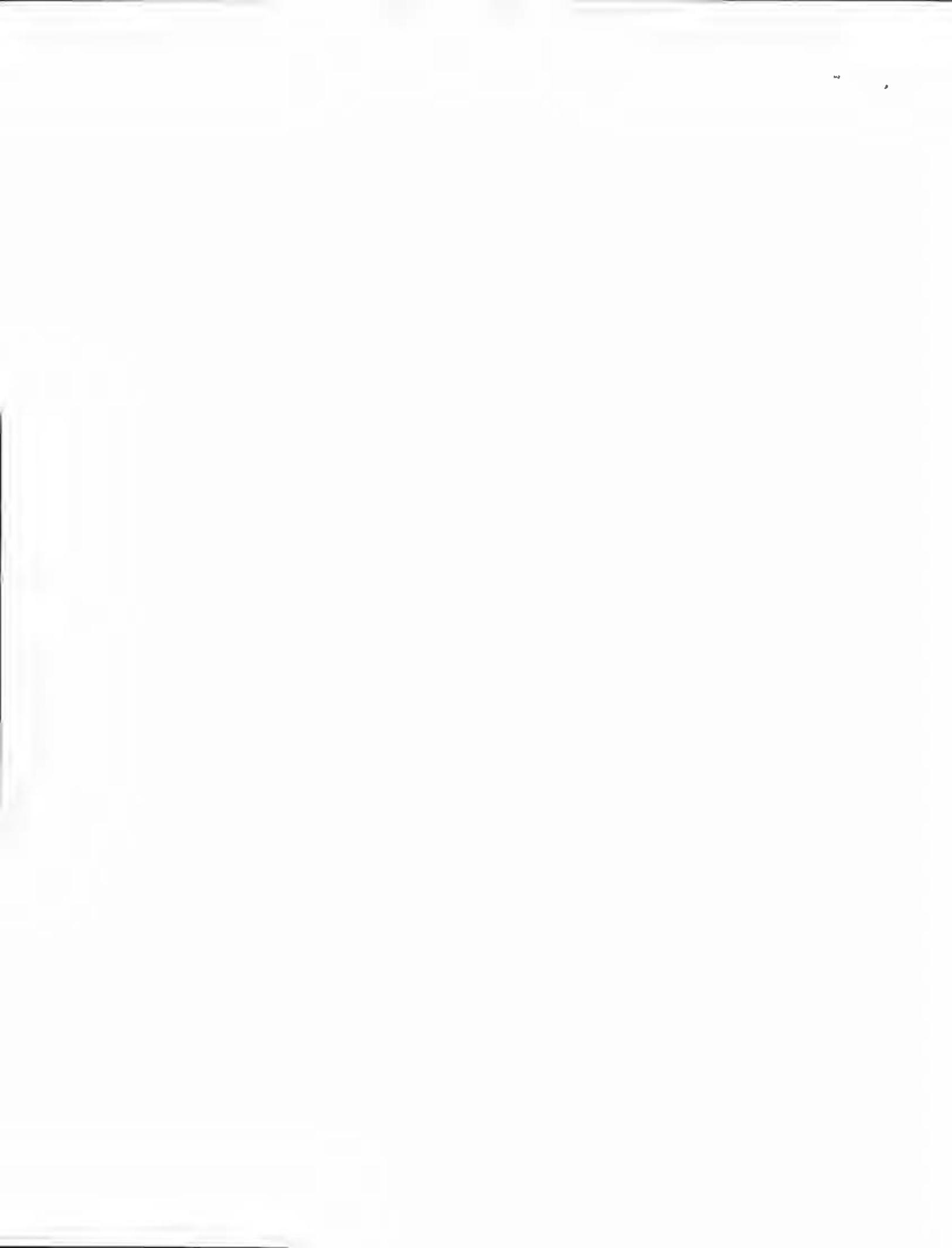
In 2011 the American Falconry Conservancy ("AFC") drafted a proposal (P40) with the assistance of several Alaska falconers to allow non-resident take of raptors, and we submitted the proposal to the Alaska Board of Game (AKBOG). During the 2012 statewide meetings cycle, AKBOG received a substantial amount of testimony and comment on the proposal. The science- and legal-based testimony reasoned that the Alaska raptor resource was healthy, and that there was no justification for not allowing non-resident take of raptors. Testimony included Alaska Department of Fish and Game (ADF&G) summaries of raptor numbers, the manner in which USFWS derived their conservative 5% take levels, the support of both resident and non-resident falconers, the concerns of a few Alaska resident falconers, and discussions on all of the concerns. At the January 2012 meetings, AKBOG decided to defer their decision on P40 until the 2014 cycle.

During the 2014 cycle, AKBOG resumed their discussions on non-resident take of raptors (P40 renumbered P174) and adopted ultra conservative provisions. AKBOG allowed for the issuance of 5 non-resident take permits annually and placed a tight restriction on the take season, especially for peregrines. Federally, Alaska peregrines may only be taken as juveniles during a season that ends on September 31, and the Alaska provisions do not allow non-residents to take peregrines until September 15. This allows nonresidents only a two-week window to harvest peregrines.

Additionally, despite ADF&G's recommendation to allow 7 nonresident permits annually, including eyasses (See P174 A (RC72) of the March 2014 AKBOG Meetings), and the AKBOG's decision to allow 5 non-resident permits, ADF&G limited their permit issuance to only 3 in 2014. It was noted by ADF&G that their original 7-permit limit was based on a percentage of what Alaska resident falconers harvest, not on resource sustainability.

The following documents are applicable to this proposal and are incorporated by reference:

1. AFC Written Testimony at January 2012 AKBOG Meetings (RC22).
2. ADF&G Presentation on Falconry at January 2012 AKBOG Meetings (RC24).
3. ADF&G Proposal 40 Presentation at January 2012 AKBOG Meetings (RC62).
4. ADF&G Presentation on Proposal 40 and Alaska Raptor Populations at January 2012 AKBOG Meetings (RC125 & RC126).
5. ADF&G Preliminary Recommendations on Proposals for January 2012 AKBOG Meetings.
6. December 29, 2011 Memorandum from AAG, Kevin Saxby to AKBOG.
7. Kodiak AC Comments on Proposals at January 2012 AKBOG Meetings (AC27)



8. February 17, 2012 Letter from AFC to AKBOG, Follow-up to January 2012 AKBOG Meetings.
9. ADF&G Proposal 174 A at March 2014 AKBOG Meetings (RC72).
10. Kodiak AC Comments on Proposals at March 2014 AKBOG Meetings (AC13)
11. March 24, 2014 Letter from AFC to AKBOG re March 2014 Meeting Decision on Non-resident Take of Raptors.
12. Final Revised Environmental Assessment, Management Plan, and Implementation Guidance: Take of Nestling American Peregrine Falcons in the Contiguous United States and Alaska for Use in Falconry, USFWS, March 2004.
13. Final Environmental Assessment: Take of Raptors From the Wild Under the Falconry and the Raptor Propagation Regulations, USFWS, June 2007.
14. Final Environmental Assessment and Management Plan: Take of Migrant Peregrine Falcons From the Wild For Use in Falconry, and Reallocation of Nestling/Fledgling Take, USFWS, August 2008.

AFC thanks the Alaska Board of Game for their consideration and we continue to offer our assistance in this important matter.

Sincerely,
American Falconry Conservancy

Troy Morris, President

