

**Kurt Schmidt**

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This is in response to proposals submitted to the Alaska Board of Game.

**I strongly oppose both proposals 92 and 93.**

**I vote/recommend to maintain the status quo allowing a nonresident take of 3 passage birds only.**

The big push for opening non-resident eyass take in Alaska by the AFC is to primarily gain access to the valuable gyrfalcon. There has been a history of AFC officers and founders conducting illegal falcon harvests in Alaska. Several nonresidents have come to Alaska and conducted illegal take and smuggling of gyrfalcons. The lack of stewardship for the resource as demonstrated by nonresidents is with precedent.

My opposition to proposals 92 and 93 are because the issues are wrongly *presented as allocation issues, but in fact proposals 92 and 93 are conservation issues.* The take or harvest of eyass nestling raptors is much different than other forms of hunting, and fishing harvests. The birds are restricted to one square meter of habitat during the eyass take season and known nest sites will most likely be repeatedly disturbed and the young removed. With the limited distribution and population of white gyrs, increasing the harvest of eyass white gyrs through non resident gyr harvest may have an adverse impact on the white color phase of the gyrfalcon.

Currently there are 46 Alaskan falconers and they harvest a total of 10 raptors per year with an annual average of only three gyrfalcons, predominantly eyass taken birds. For the past 25 years no noticeable change in gyrfalcons, population or color morphs have been documented.

Proposal 92 invites potentially 6,500 additional falconers into the state to have access to raptors same as Alaskans, which could decimate our populations in a very short time.

The white color phase of the gyr is somewhat rare, at an estimated 1% - 5% of the overall Alaska gyr population. The Alaska gyr falcon breeding population is estimated to be 500 breeding pairs with a seasonal range between 300-600 pairs (pers. Comm. Tom Cade, retired ADFG Peter Bente, and ADFG biologist Travis Booms).

Based upon this information, generous estimates indicate, there are as many as 30-60 white gyrfalcons breeding in all of Alaska. Gyr nests typically fledge 2.5 young

per year. My personal data indicate nests with one white parent produce roughly 33% white offspring. So roughly 25-50 white chicks are produced each year.

According to ADFG Falconry take data, residents average an annual take of 2.8 gyrfalcons per year. Proposals 92 and 93 intend to raise the numbers of eyass gyrs taken by 50% to 5000%. Either proposal is irresponsible to increase any amount of take

The primary species of interest for non resident take is the gyrfalcon as evidenced by the data from this past years nonresident harvest data (100% of the falconers trapped gyrfalcons, sample size 3)

It is a conservation issue because the primary focus of nonresident falconer take is eyass gyrfalcons, most notably the rare white color phase.

To propose an increased harvest of 5 eyass chicks, and factor in the standard assumption of 80% mortality rate of hatched chicks in their first year, does not leave much margin for white genetic survival.

White gyrfalcons are sought by wealthy Middle Eastern falconers. Much of the interest by nonresidents is to harvest these rare Alaskan birds to profit by breeding these birds in captivity. This foreign interest in gyrfalcons has already led to widespread poaching in nearby Kamchatka where researcher LOBKOV, has documented that focused selective harvest of white birds reduced the population composition of white birds from 39.3% to 20% in just a 10 year span. Based upon winter counts Lobkov estimates that over all the gyr population had been halved in 15 years due to illegal harvest.

Unpermitted non-resident falconers and falcon breeders are already in Alaska disturbing nest sites in violation of state and federal law.

Resident Alaskan falconers have a long term interest in protecting these birds and minimizing disturbance

A few of the founders of the AFC have been known to participate or have been prosecuted for engaging in illegal take, smuggling and or sales of wild Alaska Gyr Falcons which is illegal. In a historic context non residents have not demonstrated a sense of stewardship to the resource. At least 4 prominent wealthy falcon breeders have come to Alaska an illegally harvested gyrs.

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Since adequate enforcement does not exist, it would be unwise for the state to allow nonresidents, to have the appearance of looking lawful and to be disturbing sensitive raptor nest sites in face of a steep black market values, and little to no enforcement in the region.

I have been a Master falconer in Alaska for 16 years. I have worked as a biological contractor for the USFWS, National Park Service, The Bureau of Land Management, the U.S. Forest Service, Colorado State University, and Oregon State University, primarily as a raptor researcher. I first worked in Alaska in 1988 for the USFWS. Presently I am an educator in rural Alaska.

I have been privately observing and monitoring Alaskan gyrfalcons for the past 16 years.

Sincerely,

Kurt Schmidt