Proposal #92 Falconry – In the spirit of compromise

Most of the local falconers' concerns seem to be over access to the white phase of nestling gyrfalcons since there is a perceived greater attraction to them because they could be used in the future for breeding. Since this is the primary perceived problem, the Board might consider limiting this particular population for a time and move forward with reasonable harvest/access for all others as follows:

**Suggested compromise:** Residents and nonresidents should be permitted to harvest peregrines, both nestling and juvenile birds up to the allowable 5% of annual production.

**Reason:** This is the figure provided by USFWS Division of Migratory Bird Management and the state of Alaska. Alaska is home to thousands of peregrines and there are more than enough available to provide for resident and nonresident falconers.

**Suggested compromise:** Allow a harvest up to 20 passage gyrfalcons

**Reason:** There seems to be limited objections expressed by locals for the trapping juvenile birds capable of flight, so this should mitigate the primary social concern. Claims 500 breeding gyrfalcons in Alaska produce 750 young/year. Using the USFWS most ultra conservative 5% harvest rate would allow for 37.5 to be harvested; biologically there are no concerns.

**Safeguards in place** - Since the Board felt an abundance of caution was in order, they provided F&G Department additional regulatory authority. This should be adequate to mitigate any unforeseen
administration issues. Specifically the Board gave the Game Department discretionary authority for the following:

1. Instituting permit conditions.
2. Prohibiting harvest in sensitive areas
3. Regulating bait to be used to capture raptors

The Alaska Board of Game should allow for a reasonable harvest of these birds within sound management principles. We do not feel that an approval of 3-5 birds is a harvest; it is a token, and accomplishes little, other than to restrict nonresident access to a healthy resource on behalf of residents – i.e. protectionism. What possible “data” can be provided to justify a limited harvest of 5 birds? All evidence says that take for raptors for falconry at the suggested FWS levels has zero impact on raptor populations. The data provided in a harvest of 5 birds provides no real useful statistical information. It is simply a delay and protectionist tactic.

In closing - The Peregrine falcon is the most studied bird of all time. In 2004 the USFWS Division of Migratory Bird management published the Environmental Assessment, Management Plan, and Implementation Guidance for the Take of Nestling American Peregrine Falcons in the Contiguous United States and Alaska for Use in Falconry. The management plan showed that a harvest rate of 20% of first year peregrines was sustainable. In an abundance of caution, the state of
Alaska, through the International Association of Fish & Wildlife Agencies (IAFWA) recommended allowing for a 5% harvest.

Below is an excerpt from the plan

- “The effect of a 5% level of take is so small that it would be undetectable in any population monitoring”.

The F&G Department’s report on our proposal states that “Alaska restricted nonresident take for nearly 40 years due to one falcon being smuggled out of Alaska in the 60’s-70’s”. Unless other healthy resources are restricted based upon one individual’s unlawful behavior in decades past, such restrictions are arbitrary and capricious. This was almost 50 years ago......

With so much concern expressed by locals over the financial value of these birds they seem to have forgotten that falconers are sportsmen above all else........ The value of an Alaskan adventure to trap wild hawks and falcons transcends monetary value which is not viewed as a price/pound decision any more than any other Alaskan sport hunting fishing excursion.

Troy Morris – President
American Falconry Conservancy