

Cover Letter

RC 020

From: Kurt Schmidt HC62 Box 5405  
907-810-7076  
Delta Jct, AK 99737

To: Board of Game

Re: Late comments  
proposal Ammendments

Memo: ① Fax contains suggested  
additions to proposal 23.  
by AKDFG

② Ammendments to my  
proposal 19 - follow  
up as discussed by Dave Loring.  
To formats included -  
1 in color / 1 in Black-white

**Proposal 23 - 5 AAC 92.037.** Permits for falconry. An additional suggested change to Falconry manual #9 to be included in the current update to manual #10.

It appears there is some old accidental carryover language from manual #8, which needs to be omitted from the new revised manual #10. In Falconry Manual #9, the rule currently allows a propagation permittee to have 12 birds on the propagation permit, which is fine. The problem arises, that if said permittee were to breed and produce a single offspring they instantly fall into violation of the law for having more than 12 wild caught or F1 birds on their permit. This suggested change removes "first generation captive bred /F1 birds" from counting against your 12 wild taken birds.

**ALASKA Falconry Manual #9 pg 35.** – *underlined strike thru is the problem language-*

b. A propagation permittee may acquire no more than two wild-origin birds within a calendar year. ~~A propagation permittee may acquire no more than 12 birds for breeding that include first-generation captive bred progeny and wild-origin birds. A propagation permittee will have no limit on the number of second or later generation captive bred progeny held in captive propagation.~~

A raptor held under a propagation permit does not count as one of the raptors that may be held under a falconry permit.

page 35

I feel it should be corrected to read as follows:

**"A propagation permittee may have no more than 12 wild-origin birds on the propagation permit. There is no limit to the number of captive bred progeny held on a propagation permit."**

Currently a Propagation Permittee is allowed to have 12 wild origin birds, and is allowed to sell first generation captive bred/F1 birds. The problem arises when the permittee produces a single offspring, the F1 bird would put the Permittee in violation for exceeding the allowable number of birds.

The carryover language seemingly contradicts the intent of the law to allow propagation, yet puts successful propagators in violation. Parts of manual 8 appear to have been erroneously included in manual 9.

Here is the language from the previous Falconry manual (#8):

*A propagation permittee may have no more than four individual raptors that originated from the wild; no more than two wild-origin birds may be acquired within a calendar year. A propagation permittee may have no more than 12 birds for breeding that include first-generation captive progeny and wild-origin birds. A propagation permittee will have no limit on the number of second or later generation captive-bred progeny held in captive propagation. A raptor held under a propagation permit does not count as one of the three raptors that may be held under a falconry permit.*

**PROPOSED BY:** Kurt Schmidt

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**AMENDMENT TO PROPOSAL 19**

*Please accept this comment as an amendment to my falconry proposal #19.*

*The Amendment – makes passage raptor nonresident season date changes to only GMU's 23 and 26.*

PROPOSAL 19 – 5 AAC 92.037. Permits for falconry. Change the nonresident season for taking passage raptors in GMU's 23 and 26 as follows:

Amended regulation should read:

(7) take is limited to one passage, hatching-year raptor;

(8) the annual nonresident season for acquiring a passage raptor in GMU's 23 and 26 is from [SEPTEMBER 5 – NOVEMBER 20]; in the remainder of the state the annual nonresident season for acquiring a passage raptor is from [AUGUST 15 – OCTOBER 31];

The regulation currently reads:

(7) take is limited to one passage, hatching-year raptor;

(8) the annual nonresident season for acquiring a passage raptor is from [AUGUST 15 – OCTOBER 31];

What is the issue you would like the board to address and why? This proposal's intention is to roll the nonresident passage take season start date back 20 days from August 15 to September

5, thus allowing young raptors to mature and disperse from their natal sites, making it less likely that targeting certain genetic progeny of certain nesting pairs can occur repeatedly over the years.

Current nonresident effort with ever increasing demand could cause the loss of certain scarce genetics by concentrated excessive harvest from the wild gene pool year after year.

Taking of young birds before dispersal, allows for the undesirable impacts of targeting the progeny of specific nest pair genetics from the same nest sites, year after year.



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A majority of the nonresident permit applicants are raptor breeders and/or their affiliates and are targeting certain localities and very specific genetic stock. Concentrated attention toward the offspring of these individual birds can ultimately effect the presence and maintenance of certain scarce genetics in the wild.

As nonresident demand for Alaskan birds increases, (demand already surpasses current resident take), we need to have measures in place to preclude undesired affects that will be most likely harmful to the wild gene pool in the future.

It is ok to retain the 76-day nonresident passage season, but adjustments must be made to the start date to better protect nesting pair genetics from the potential long-term impacts of nonresident over selective harvest. Rolling back the start date will greatly dilute concentrated nonresident effort impacting targeted pairs, yet allow nonresidents a reasonable opportunity to take a randomly encountered passage bird.

PROPOSED BY: Kurt Schmidt (EG-F17-090)

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**ALASKA Falconry Manual #9 pg 35.** - in red is the problem language

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[REDACTED]

Currently a Propagation Permittee is allowed to have 12 wild origin birds, and is allowed to sell first generation captive bred/F1 birds. The problem arises when the permittee produces a single offspring, the F1 bird would put the Permittee in violation for exceeding the allowable number of birds.

The carryover language seemingly contradicts the intent of the law, and is included below for reference.

Here is the language from the previous Falconry manual (#8):

*A propagation permittee may have no more than four individual raptors that originated from the wild; no more than two wild-origin birds may be acquired within a calendar year. A propagation permittee may have no more than 12 birds for breeding that include first-generation captive progeny and wild-origin birds. A propagation permittee will have no limit on the number of second or later generation captive-bred progeny held in captive propagation. A raptor held under a propagation permit does not count as one of the three raptors that may be held under a falconry permit.*

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