



October 8, 2017

The North American Falconers Association is the largest membership falconry organization in the world, representing the falconry community of all three countries on this continent. On behalf of our membership, I would like to thank you for the opportunity to comment on the proposals that have been submitted to your board for consideration.

Wild raptors are an important and integral part of the long traditions of the cultural heritage of falconry; and, therefore, falconers are among the most ardent raptor conservationists. NAFA continues to strongly support science-based, biologically sustainable management of falconry and birds of prey and we have always encouraged the development of non-resident take provisions across the United States.

NAFA was very pleased, therefore, when the Alaska Board of Game and Fish introduced a modest non-resident take for the first time in 2015. It was our understanding that the Alaska Board of Game and Fish would review this new program after 5 years. Only 2 years have passed, and we believe that is simply not enough time to gather the experience or trend data that would support sound decision-making on some of the restrictive changes proposed.

Alaska has enormous raptor resources with species that are difficult to obtain in many other parts of the country. A trip to Alaska to obtain a falconry raptor represents the opportunity of a lifetime for many falconers in the lower 48. Our detailed comments on the individual proposals are as follows:

Proposal 18 – NAFA Supports. Removing the West Nile virus vaccine requirements, it is scientifically defensible and will abolish an unnecessary portion of the regulations that govern falconers in Alaska.

Proposal 19 – NAFA Opposes. Moving to a later start-date for nonresidents who are permitted to trap raptors in Alaska further restricts access to a resource that is already more than adequately protected through an extremely limited level of access. A later start-date could potentially endanger out-of-state falconers seeking birds in remote areas, due to the onset of foul weather. The concern stated as a rationale for the proposal is scientifically indefensible and, if true, would apply to residents as well as non-resident falconers. In addition, there simply has not been enough time to determine whether the focus on specific nests is, in fact a meaningful trend.

Proposal 20 – NAFA Opposes. This is an onerous restriction and at this point there is almost no data on the level of "repeat" demand from non-resident falconers. This proposal is simply one more restriction on a system that is already incredibly restricted, further limiting already limited access. It is biologically unnecessary. The comparison to large game animals is inapposite, as the biology, take levels, and non-resident demand for these animals is very different.



Proposal 21 – NAFA Opposes. Requiring nonresident or resident falconers to microchip a passage raptor is biologically, scientifically, and philosophically indefensible, and is a restriction founded upon the presumption that falconers are not worthy of the trust and respect of any other group of citizens practicing an outdoor activity involving wildlife. To the contrary, falconers are law-abiding citizen-scientists, that scrupulously adhere to the myriad of laws and regulations that govern the falconry heritage that we all practice. Suggestions to the contrary are false and unacceptable; and our board of directors condemns any accusation or action that is inconsistent with the fact that the falconry community is composed of honest and honorable people. Furthermore, banding requirements are already in place, making microchips superfluous.

Proposal 22 – NAFA Supports. This proposal is a step in the right direction. Further, the closing paragraph in the supporting language of this proposal is in keeping with the views shared by the community of falconers that NAFA represents. In particular, we are referencing the line which reads; "We are proud of the privilege of residing in Alaska and having access to its vast natural resources, and are willing and happy to share with others our passion for the sport." However, we would note that falconry is better referred to as an intangible cultural heritage of mankind, and has been recognized as such by the United Nations Educational, Scientific and Cultural Organization.

Proposal 23 – NAFA Supports. These proposed changes appear to be simply clerical and are clean and concise. We are in favor of adopting all of the proposed edits outlined herein.

Once again, we thank you for the opportunity to comment on these proposals and would like to offer any additional assistance that you are willing to call upon us for.

Respectfully,

A handwritten signature in black ink that reads 'Scott McNeff'.

Scott McNeff
NAFAPresident@n-a-f-a.com
(207) 604-6283

