

Mr. Ted Spraker, Chairman
Alaska Board of Game

February 22nd, 2017

Mr. Ted Spraker, Alaska Board of Game members,

The Alaska Falconers Association (AFA) is requesting the Board of Game to write a letter to the Secretary of the Interior asking that the Secretary rescind a recent rule that was published on January 12, 2017 titled "Alaska Subsistence Collections", (RIN 1024-AE28). This request should be sent it to the Secretary upon his confirmation which is scheduled for the first week of March 2017. (Mr. Ryan Zinke is President Trump's current nomination for the position). This rule includes at least two provisions that are in direct conflict with the management authority of the State of Alaska. The first provision deals with bear bait and the second provision deals with the closure of ANILCA Park units to the take of raptors for use in falconry.

This rule is currently suspended under an executive order issued by the President and the suspension is in effect for 60 legislative days from the date of the executive order. The 60 day suspension period ends on or about March 21, 2017. Time is of the essence for submission of the Boards letter and request.

Alaska Falconers Association is requesting the Board of Game to ask Assistant Attorney General Cheryl Rawls Brooking to amend the civil lawsuit titled State of Alaska vs. Sally Jewell to include the rule titled "Alaska Subsistence Collections", (RIN 1024-AE28). This rule was published in the federal register at or near the time that the State vs. Jewell action was filed with the courts. We feel that it is important that this latest rule be incorporated in the lawsuit because the actions taken by the National Park Service are in direct violation of the management authority granted to the State of Alaska to manage wildlife on refuges and preserves that are open to sport hunting under provisions of ANILCA.

The Alaska Falconers Association is asking the Board of Game to Write a letter to the National Park Service advising the NPS that this rule "Alaska Subsistence Collections", (RIN 1024-AE28) as it applies to bear baiting and raptor take for falconry, is in direct violation of the management authority granted to the state of Alaska under ANILCA. AFA is also asking the Board of Game to advise the NPS that their failure to advise the Board of Game, the State Advisory Committees, and the licensed Alaska falconers (the stakeholder group most affected by the closure to the take of raptors for falconry) was not an appropriate course of action to take and did not that allow participation in the rule making process by the affected public.


AFA wants to stress to the Board of Game that we do not feel that this NPS rule is a falconry or bear bait issue, but a violation of the authority granted to the Alaska

Department of Fish and Game and the Alaska Board of Game to manage wildlife on refuges and preserves established under provisions of ANILCA. This NPS rule uses raptor take and bear bait as a vehicle to over step their authority. Next time they over step their authority, it could deal with wildlife management decisions that will affect thousands of Alaska resident resource users. AFA is aware that the Board is going to address several issues that involve NPS related issues and that there are requests by testifiers that common ground be reached between the State and the Park Service. Deliberations on these proposals might provide the vehicle to address the NPS over reach on record and ask them publically to withdraw the bear bait and raptor take sections of the Alaska Subsistence Collections rule.

With this letter, I have included an information packet containing the letters to the NPS, answers from the NPS, press releases and associated emails. These documents contain more than the 10-page maximum number that can be submitted as an RC. This packet has been submitted to Board Support staff for reference and is not in itself a part of this RC.

The Alaska Falconers Association, founded in 1979, represents the interests of all Alaska falconers.

Thank you for your attention into this matter.

Sincerely,

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