



Alaska Office

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Via Facsimile: 907-465-6094

Mr. Cliff Judkins, Chairman, Board of Game
Ms. Kristy Tibbles, Executive Director, Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Judkins and Ms. Tibbles:

Defenders of Wildlife (“Defenders”) appreciate the opportunity to submit these written comments on proposals that will be considered at the February 27—March 11, 2009 meeting in Anchorage, Alaska.

Established in 1947, Defenders is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focus on the accelerating rate of species extinction and associated loss of biological diversity and habitat alteration and destruction. Defenders also advocates for new approaches to wildlife conservation that will help prevent species from becoming endangered. We have field offices around the country, including in Alaska where we work on issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears and impacts from climate change. Our Alaska programs seek to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. Defenders represent more than 5,800 members, activists and subscribers in Alaska and more than one million nationwide.

1. CHUGACH STATE PARK

Proposal 22. We support this proposal and urge the Board to adopt it.

This proposal would repeal the lynx trapping season in Chugach State Park.

Chugach State Park is adjacent to Anchorage, Alaska’s largest urban center. It attracts thousands of visitors annually who hike, ski, backpack, mountain bike and view wildlife and scenery. Virtually all of these park users eagerly seek wildlife within the park to enhance their outdoor experiences. Along with moose, Dall’s sheep, eagles and a host of smaller mammals and birds, there are several rare, charismatic species that are highly sought for viewing. These include lynx.

Lynx populations rise and fall along with snowshoe hares that fluctuate in 10-year cycles. During many years lynx are rare in the park adding to their status as important watchable wildlife. In the absence of reliable population estimates the Board should manage the lynx population conservatively. Trapping of lynx, especially during low periods in their cycle, may reduce numbers to unacceptably low numbers including the potential of harvesting more animals than the lynx can sustain. Lynx populations in all

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other states of the union have demonstrated a strong susceptibility to human harvest. In addition, with the strong biological need for reducing wolverine harvest in the park, the risk of incidental wolverine bycatch is unacceptable. Regulations allowing one large mammal to be harvested and not another is impractical and does not lend itself to prudent management of the resource based on scientific parameters.

We urge the Board to recognize the value of prioritizing lynx for viewing within the park for the benefit of thousands of people as opposed to benefiting only a very small number of trappers and risking overharvest of the wolverine population due to bycatch. Closing the lynx trapping season within the park will enable park managers to provide for increased wildlife viewing, one of the purposes established by the state legislature when it created the park.

Proposal 27. We support this proposal and urge the Board to adopt it.

This proposal would repeal the wolverine trapping season in Chugach State Park.

Chugach State Park is adjacent to Anchorage, Alaska's largest urban center. It attracts thousands of visitors annually who hike, ski, backpack, mountain bike and view wildlife and scenery. Virtually all of these park users eagerly seek wildlife within the park to enhance their outdoor experiences. Along with moose, Dall's sheep, eagles and a host of smaller mammals and birds, there are several rare, charismatic species that are highly sought for viewing. These include wolverines.

When the Board opened the wolverine trapping season in 2007 it precipitated a storm of public protest in Anchorage. A public meeting drew about 100 people opposed to the opening. Concerns were raised both about reducing wolverine numbers and thereby reducing opportunities to see wolverines, and about the dangers to humans and dogs posed by the large foothold and killer traps used for wolverines. Proposals were submitted at subsequent Board meetings to close the season but the Board failed to do so.

Biological concerns about over-harvesting wolverines were raised from the outset, including by Department of Fish and Game biologists. Now, recent surveys confirm that harvests exceed maximum sustainable rates (see data contained in proposal 27). The Alaska Department of Fish and Game (ADF&G) harvest and population data clearly show that the harvest of wolverines is dramatically exceeding the carrying capacity of the wolverine population in Chugach State Park over the last two trapping seasons. The sustainable harvest rate is estimated to be approximately two wolverine per year, with only one of those a female. Ten wolverines have been harvested in the last two years, of which, eight were female. Combine the harvest rates with the fact that the latest population estimate is a census that reliably estimated only eighteen wolverine were left in the park and you have nothing short of a biological emergency based on the harvest rates since opening up wolverine trapping in the park. Biological concerns about over-harvesting wolverines were raised from the outset, including the Department of Fish and Game biologists and the public.

Historical harvest rates for wolverines prior to allowing trapping in the park were 2.5 per year in Unit 14C, indicating that removing trapping from the park is an effective way to reduce the anticipated harvest to the estimated sustainable harvest level for the region's wolverine population. In addition, the Anchorage AC strongly supports removing trapping of wolverines in Chugach State Park.

It is important that the Board also recognize that the situation is critical and the wolverine population is very small. Reducing by catch by limiting trapping in general is highly recommended based on a biological necessity.

We urge the Board to recognize the value of preserving wolverines for viewing within the park for the benefit of thousands of people as opposed to benefiting only a very small number of trappers. Closing the wolverine trapping season within the park will enable park managers to provide for increased wildlife viewing, one of the purposes established by the state legislature when it created the park.

2. BROWN BEARS

Proposal 35. We *oppose* this proposal and urge the Board to not adopt it.

This would extend the brown bear hunting season in Units 6A, B, and C from May 31 to June 10, with the stated purpose of controlling predation for the benefit of dusky Canada geese and moose.

We believe that a regulatory change solely to control brown bears as predators should, if justified by adequate data, only be made after first establishing a brown bear control area such as was established in GMU 19D (EMMA) and 20E.

The designation of a formal predation control area would follow responsible management guidelines, set program objectives and harvest goals as well as impose conditions and other limitations appropriate and specific to the nature of the area. It would also require annual reports to the BOG from ADF&G on whether the program was meeting its objectives. These procedures were established to responsibly manage predators and prey, facilitate program peer review and better inform the public as to the nature and progress such controversial programs.

An additional concern about this proposal is that late spring/early summer bears are more likely to have poor hide quality due to rubbing. This diminishes the trophy quality of the animal and contributes to the waste of a valuable resource.

A final concern is that it is well known that brown bear predation is highly variable from animal to animal. Reducing bears overall is an inefficient way to get at individual animals that have developed the skill and habit of targeting newborn prey species. Relocation of specific problem bears is a better alternative than increasing the take by lengthening hunting seasons.

Proposal 43. We *support* this proposal and urge the Board to adopt it.

This proposal would close the brown bear hunting season in portions of Unit 9C.

During the past 20 years demand for brown bear viewing in Alaska has grown exponentially. Alaska offers world-class viewing opportunities for bears but there are a very limited number of sites specifically designated for bear viewing. These include McNeil River Falls where a permit program allows a limited number of participants to experience bears fishing for salmon. After leaving the falls in autumn, some of the McNeil bears are known to travel in the geographic area covered by proposal 43 and are subject to hunting. Because of the worldwide importance McNeil and the unique opportunity it

offers, it is vital to protect the bears that become habituated to close encounters with humans and are very vulnerable to hunters as a result.

We urge the Board to recognize the value of preserving bears for viewing and to close areas used by McNeil bears when they are subject to hunting, thereby benefiting thousands of nonconsumptive users and supports one of the state's largest industries, the tourism industry, at the expense of only a few hunters. The non-consumptive use of this bear population greatly outweighs the very small consumptive use currently occurring.

Proposal 44. We *support* this proposal and urge the Board to adopt it.

This proposal would establish a drawing permit for brown bear hunting in portions of Unit 9C, Katmai National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Katmai National Preserve lands.

Proposal 44 details the problem: the NPS mandate to provide for high concentrations of bears has been compromised by recent increases in brown bear harvests as a result of more liberal seasons, in particular in the fall when bears are concentrated on easily accessible salmon spawning streams. Managing harvests more conservatively through a drawing permit is a possible solution to addressing the needs of both the NPS and the other user groups that rely on this resource. In addition, there is a very strong need for additional field studies. We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's memorandum of understanding regarding management goals on federal lands.

Proposal 45. We *support* the intent of this proposal and urge the Board to restrict the harvest of Brown Bears on Katmai National Preserve lands.

This proposal would shorten the brown bear hunting season in portions of Unit 9C, Katmai National Preserve.

The intent of this proposal is similar to Proposal 44 -- to adjust the harvest of Brown Bears on Katmai National Preserve lands so as to allow NPS to fulfill its mandate of providing for high concentrations of bears. This mandate has been compromised by recent increases in brown bear harvests as a result of more liberal seasons, in particular in the fall when bears are concentrated on easily accessible salmon spawning streams. Managing harvests more conservatively by limiting the season to every other year address's the needs of both the NPS and the other user groups, including the hunter, that rely on this resource. Reducing the harvest will aid in the trophy status management objective for brown bears as well by allowing bears to reach the maximum age.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

Proposal 51. We *support* this proposal and urge the Board to adopt it.

This proposal would shorten the brown bear hunting season and reduce the bag limit in Unit 17B, Lake Clark National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Lake Clark National Preserve lands.

Proposal 51 details the problem for Lake Clark National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

Proposal 76. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would increase the brown bear bag limit in Unit 13E.

There is no recent biological information indicating excessively heavy predation on moose, caribou and sheep in Unit 13E, nor is there any reason to believe that increasing the bag limit to 2 bears per year will result in more ungulates for hunters. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on brown bears have been excessively liberalized in many areas. GMU 13 is the best example available where liberal seasons and bag limits on grizzly bears failed to improve moose calf survival and indeed failed to reduce bear numbers. There is no justification whatever to further liberalize the regulations.

Proposal 77. We *support* this proposal and urge the Board to adopt it.

This proposal would shorten the brown bear hunting season and reduce the bag limit in Unit 13C, Wrangell St. Elias National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Wrangell St. Elias National Preserve lands.

Proposal 77 details the problem for Wrangell St. Elias National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were

lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

Proposal 78. We *support* this proposal and urge the Board to adopt it.

This proposal would create a registration permit hunt for brown bears in Unit 11Z, Wrangell St. Elias National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Wrangell St. Elias National Preserve lands.

Proposal 78 details the problem for Wrangell St. Elias National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

Proposal 130. We *oppose* this proposal and urge the Board to not adopt it.

This would substitute a general brown bear hunt for a permit only hunt in GMU 7.

The present conservative permit system with a quota based on total mortality (including DLP which alone has exceeded the sustainable mortality estimates for many years now) recognizes the sensitivity of the Kenai Peninsula brown bear population to over harvest. Without the longstanding controls and safeguards of a permit system, too many bears could be harvested in a short time before ADF&G could close the season by emergency order. The interagency study team (IBBST) objectives---harvests not to exceed 20 bears annually, averaged over 3 years, with a limit of 8 females) recognize that Kenai Brown bears are a "Species of Special Concern," requiring strict controls to assure conservation through sustained yield. With a very limited geographical range, and increasing threats from human encroachment and habitat alteration, the population continues to be threatened, especially with ADF&G population estimates being not based on any bear census studies, as stated in S and I Brown Bear Management Reports (see July 2004-June 2006).

Proposal 131. We *oppose* this proposal and urge the Board to not adopt it.

This would create a brown Bear archery hunt in GMU 7 to reduce problem bears

DLP bear kills have remained high in GMU 7. From 1999 to 2006, from 13 to a high of 29 bears were taken by DLP. (Season closures have occurred over the last 4 years). However, increasing the hunting effort would not effectively address the problem. Most human bear conflicts occur around popular fishing spots, recreational trails, or attractive garbage and nuisance sites---a limited area of GMU 7 geographically. Many of the recent DLPs were in association with chicken coops. The proposal makes no effort to restrict the archery hunt to these areas, Nor is there research or other evidence to suggest that bears taken by archers would likely reduce DLP kills. It will likely be an additive kill which would jeopardize the threatened bear population further. The interagency Brown bear study team should be revitalized and more aggressively pursue solutions to non-hunting caused mortality of Kenai bears. Though partly an educational process, this will require increasing cooperation from the public and local governments (waste management control) in order to better protect this resource.

Proposal 133. We *oppose* this proposal and urge the Board to not adopt it.

This would liberalize brown bear hunting in GMU's 7 and 15 by providing for a harvest of 20 reproductive females (not to be counted in the quota of 20) as a moose predation control measure.

There is no data on brown bear population estimates to indicate the brown bear population has increased to a level that would warrant such a dramatic and aggressive reduction program that targets female brown bears. The CPAC provided no scientific data to justify its claim that the brown bear population is too high. They base their claim on speculation alone.

In addition, the AC claims that moose predation is occurring at unacceptable levels. Again, pure speculation backed up by no reference to biological data or ADF&G support.

As before, we believe that bear predation control, if justified by adequate scientific data, must not be conducted without first establishing a formal bear predation control area. This follows past precedent in order to set measurable goals and objectives as part of the responsible management of a sensitive resource. Kenai brown bears retain the status of a "species of Special Concern," requiring very conservative management.

Proposal 135. We *oppose* this proposal and urge the Board to not adopt it.

This would allow a harvest of brown bear on the Kenai (GMU's 7 and 15) regardless of DLP mortality

To responsibly conserve brown bears on the Kenai in light of their special status of concern, all mortality should be considered when arriving at a permissible harvest quota for each calendar year. According to the Brown Bear Management Report of 2005-2006 authored by J. Selinger, " there has never been a formal census conducted to produce a statistically valid estimate for the Kenai brown bear population." (at P.66). Without an accurate census, all mortality is critical in determining a proper threshold for an allowable hunt. In 2006, 29 DLP bears were taken, far exceeding the number that is permissible before a hunting season can be established. To not count this figure would clearly violate sustained yield principles, since a threshold of 14-21 bears maximum has been established (7 percent of the population).

Proposal 136. We *oppose* this proposal and urge the Board to not adopt it.

This would eliminate brown bears as a species of special concern, extend the hunting season and establish 50 drawing permits.

We believe this proposal by a state Advisory Committee demonstrates an incredible disregard for established principles of sustained yield management found in Title VIII of Alaska's state Constitution.

There is no justification for liberalization of hunting seasons for brown bear on the Kenai. The Anchorage AC bases its request largely on anecdotal information of which they provide nothing but their "perceived" conclusions. Basing population growth on the rate of DLP's per year carries little to no scientific credibility and provides no indication of relative brown bear populations, especially when trail improvements, park improvements, new housing projects all are contributing to increased access into brown bear habitat and migration corridors is occurring each year.

A responsible interagency team of professionals has determined that a low threshold of permissible mortality is appropriate for Kenai bears. ADF&G took this action because it found the population "is vulnerable to a significant decline due to low numbers, restricted distribution, dependence on limited habitat resources, or sensitivity to environmental disturbance." (Kenai Peninsula Brown Bear Strategy, June 2000). The latest estimated trend establishes the population as stable or in places slowly increasing. In light of the population's sensitivity and ADF&G's lack of population census data, we believe that no change is justified in the hunting regulations. The proposal offers hunting as a suggested substitute for DLP kills but this fails to acknowledge that DLP usually adds to overall mortality instead of substituting for it.

As for the role of the BOG in Kenai brown bear management, the BOG is not bound by the interagency team recommendations. As with other management plans, these are just "documents frequently used as references for developing management strategies." (P.67, Brown bear Management Report, 2006). The GMU 4 Brown bear Management Plan is another example of a document the BOG used to modify existing regulations, after using a diverse stakeholder approach.

Proposal 170. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would allow trapping and snaring of bears in Unit 16 under a predator control permit.

Although the first sentence refers to brown bears, much of the justification mentions black bears. It is unclear which species is intended. We assume both black and brown bears could be trapped and snared if the Board adopts this proposal.

Trapping and snaring of bears have long been prohibited in Alaska. There are many reasons to continue this ban. Steel leg-hold traps large enough to hold bears are a serious danger to humans and likely would be fatal to pets. All but one or two states recognized these dangers decades ago and prohibited trapping of bears.

Snares for bears would be set during the non-winter months when bears are active. These are not the months when furbearer snares are set. Snares set for bears would likely catch many non-target species including moose and caribou.

We doubt that significantly more bears would be taken by trapping and snaring if it was legal, and doubt that additional ungulates would be available to hunters as a result of adopting this proposal. The benefits would likely be small compared to the costs and risks to human safety.

Using traps or snares to kill brown or black bears raises serious ethical and humane issues. Catching and holding large powerful and potentially dangerous animals presents a situation where wounding loss and injury can occur, as demonstrated in Unit 4, brown bear tagging and capture programs using snaring along salmon streams as the capture method. Injured bears can escape, resulting in prolonged suffering. With regulations like this, public acceptance of hunting will be diminished, adversely impacting responsible hunters.

Proposal 174. We *support* this proposal and urge the Board to adopt it.

This proposal would shorten the brown bear hunting season and reduce the bag limit in Unit 16B, Denali National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for bear hunting on Denali National Preserve lands.

Proposal 174 details the problem for Denali National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce brown bears in order to increase moose. Bear hunting seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Recent increases in bear harvests conflict with the NPS objective of providing high concentrations of bears. Harvests should be reduced by shortening seasons and reducing bag limits.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

Proposal 201. We *support* this proposal and urge the Board to amend and adopt it.

The intent of this proposal, to have a wounded but not recovered animal count against the bag limit, is a concept long part of regulations governing hunting of trophy species in Africa and a strong component of the North American Model of Game Management's ethical standards. We find it to be a valuable addition to the hunting regulations in Alaska to enhance hunting ethics, and suggest that it be applied to all big game species statewide.

There is also precedent in existing BOG regulations. In Units 1-5, and in Unit 8, bears wounded by a hunter count as the bag limit for the regulatory year. Wounded means there is sign of blood or other sign that the bear has been hit by a hunting projectile.

It is important to count wounded bears in the harvest statistics because bears that are never counted in the harvest statistics that later die result in misleading annual harvest data that could jeopardize sustained yield of the resource.

3. BLACK BEARS

Proposal 29. We *support* this proposal and urge the Board to amend and adopt it.

The intent of this proposal, to have a wounded but not recovered animal count against the bag limit, is a concept long part of regulations governing hunting of trophy species in Africa and a strong component of the North American Model of Game Management's ethical standards. We find it to be a valuable addition to the hunting regulations in Alaska to enhance hunting ethics, and suggest that it be applied to all big game species statewide.

There is also precedent in existing BOG regulations. In Units 1-5, and in Unit 8, bears wounded by a hunter count as the bag limit for the regulatory year. Wounded means there is sign of blood or other sign that the bear has been hit by a hunting projectile.

It is important to count wounded bears in the harvest statistics because bears that are never counted in the harvest statistics that later die result in misleading annual harvest data that could jeopardize sustained yield of the resource.

Proposal 125. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would create a predator control program in Units 7 and 15 and allow the sale of black bear hides and skulls.

There is no recent biological information indicating excessively heavy black bear predation on moose in Units 7 and 15, nor is there any reason to believe that allowing the sale of hides and skulls will result in more moose for hunters. Indeed there is little to indicate that the sale of black bear hides would do anything but promote illegal harvest of bears for profit. The Alaska State Wildlife Troopers have long opposed the sale of bear parts and have consistently testified that request it, particularly when the harvest in the adjacent GMU or regional GMU's do not allow selling of bear parts. The current regulatory structure and funding allocation for enforcement does not provide the regulatory tools required to effectively manage the sale of bear parts for profit.

Proposals like this are typical of the "war on predators" that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain high harvest rates for ungulates. Seasons and bag limits on black bears have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Indeed, in Unit 16 the data clearly shows that allowing the sale of black bear hides was not effective at increasing black bear harvest.

Until field studies confirm that black bear predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce bear numbers.

Proposal 126. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would increase the bag limit for black bears in Units 7 and 15 to 3 bears per year.

There is no recent biological information indicating excessively heavy black bear predation on moose in Units 7 and 15, nor is there any reason to believe that a bag limit of 3 will result in more moose for hunters. In addition, there is no indication that the black bear population is excessively high or is even increasing at all.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain high harvest rates for ungulates. Seasons and bag limits on black bears have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result.

Until field studies confirm that black bear predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce bear numbers.

Proposal 128. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would allow the sale of black bear hides in GMU 15.

To allow the sale of bear hides in some units but not in others, especially adjacent units, creates serious enforceability problems. Indeed there is little to indicate that the sale of black bear hides would do anything but promote illegal harvest of bears for profit. It fosters misreporting GMU kill locations in order to be able to sell the hide.

The Alaska State Wildlife Troopers have long opposed the sale of bear parts and have consistently testified against any proposals that request it. The current regulatory structure and funding allocation for enforcement does not provide the regulatory tools required to effectively manage the sale of bear parts for profit.

Commercialization of bear hides establishes a precedent which many believe leads to pressure and openings for the sale of other lucrative but illicit parts such as gall bladders on black markets worldwide.

This liberalization is also based on bears as predators of moose calves, but there is no evidence presented that the sale of hides in other areas has alleviated moose calf predation which tends to be dependent on the habits of a limited number of specific bears

Proposal 132. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would create a predator control program and issue 50-100 hunting permits annually for brown bears during spring and fall seasons in Units 7 and 15.

Kenai Peninsula brown bears are a species of special concern. Bears are managed according to specific provisions in a management plan designed to preserve a viable bear population by limiting the total annual loss of bears from all sources of human-caused mortality. This proposal, if adopted, would derail that plan. DLPs have consistently exceeded the estimated maximum sustainable mortality rate in recent years indicating the population may be in trouble. In situations where there are no reliable census estimates on bear populations a conservative approach to harvest rates should be considered.

There is no recent biological information indicating that heavy brown bear predation is limiting Kenai Peninsula moose. In fact, past studies have shown black bears to be a more significant predator on

neonate moose than brown bears. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on brown bears have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that brown bear predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce bear numbers.

Proposal 197. We *oppose* this proposal and urge the Board to not adopt it.

This would drop sealing requirements for bears for people not living on the road system.

Other than for convenience, there is no justification offered for this proposed regulatory change. Sealing bears is an extremely important management tool for ADF&G to accurately measure and analyze the harvest of bears in different GMU's. Sealing data determines where and how the animal was taken, as well as measurements and biological samples. Sealing also aids in curbing the illegal take of bears by identifying the specific area from which the bear was taken. Bear sealing requirements have been in effect since statehood and are a vital conservation measure to assure sustained yield of a valuable resource.

Proposal 199. We *oppose* this proposal and urge the Board to not adopt it.

This would lengthen black bear baiting seasons in GMU's 7 and 15 (and others) from June 15 to June 30.

We oppose all bear baiting that applies to GMU's 7 and 15. One of the main reasons for the unacceptably high DLP kill (29 in 2006 and over a 100 since statehood) is human and pet food attractants. Bears can detect food odors at great distances, including garbage, pet food, bird food, fish-cleaning tables, fish smokers, fishing bait and bee apiaries. Once a bear develops a taste for certain food used at black bear bait stations, it often continues to seek out that food. Under state law it is illegal to feed bears and we believe that baiting bears constitutes feeding bears. ADF&G has little authority to manage non hunting activities that contribute to the rising trend in bears killed in DLP, but the BOG can eliminate bear baiting in areas where black and brown bears mix and food attractants are resulting in an unacceptably high level of DLP kills. Short of this, the use of cooking oils, fat, and other human food should be specifically prohibited as allowable baiting substances. It should be noted that of all the issues mentioned by the public in the development of the Kenai Peninsula Brown Bear Strategy in 2000, black bear baiting was mentioned most often.

Proposal 224. We *support* the concept of having the Board continue protection for white-colored bears.

White-colored morphs of black bears occasionally occur throughout the range of black bears in North America. They are very rare and may have spiritual significance for some people. They also provide viewing pleasure for many who are awed by the presence of such beautiful and rare animals. We urge the Board to continue protection for white-colored bears with whatever regulatory means are available. Failure to do so (with resulting loss of these animals to hunters) would create ill will toward the Board from many people who value wildlife as much more than mere game animals.

4. WOLVES

Proposal 64. We *support* this proposal and urge the Board to adopt it.

This proposal would shorten the wolf hunting season and reduce the bag limit in portions of Unit 9.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Lake Clark, Katmai and Aniakchak National Preserve lands.

Proposal 64 details the problem for Lake Clark, Katmai, and Aniakchak National Preserves: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase caribou. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more caribou for hunters. Harvests should be reduced by shortening seasons and reducing bag limits.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

Proposal 67. We *support* this proposal and urge the Board to adopt it.

This proposal would reduce the bag limit for wolves in portions of Unit 17, Lake Clark National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Lake Clark National Preserve lands.

Proposal 67 details the problem for Lake Clark National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase moose. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Harvests should be reduced by shortening seasons and reducing bag limits.

We urge the Board to take these steps and thereby demonstrate willingness to work cooperatively with NPS as indicated in the State of Alaska's MOU regarding management goals on federal lands.

Proposal 112. We *support* this proposal and urge the Board to adopt it.

This proposal would reduce the bag limit for wolves in portions of Unit 13C, Wrangell St. Elias National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Wrangell St. Elias National Preserve lands.

Proposal 112 details the problem for Wrangell St. Elias National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase moose. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

Proposal 186. We *support* this proposal and urge the Board to adopt it.

This proposal would reduce the bag limit for wolves in portions of Unit 16B, Denali National Preserve.

When ANILCA passed in 1980 and established vast areas of new National Preserves it set the stage for conflicting management approaches. National Park Service mandates applied to the preserves but hunting was subject to state regulations. At times, state regulations were not in accordance with requirements of federal statutes and regulations governing NPS lands and their management. Such was the case for wolf hunting on Denali National Preserve lands.

Proposal 186 details the problem for Denali National Preserve: the NPS mandate to not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor allow others to do so on NPS lands has been compromised by state regulations designed to reduce wolves in order to increase moose. Wolf seasons and bag limits were lengthened under the umbrella of intensive management in an attempt to provide more moose for hunters. Harvests should be reduced by shortening seasons and reducing bag limits. We urge the Board to take this step and thereby demonstrate willingness to enable NPS to fulfill its mission.

5. PREDATOR CONTROL

Proposal 49. We *oppose* this proposal and urge the Board to not adopt it.

Proposal 49 if adopted would create a predator control program aimed at reducing brown bears to increase moose for hunters in Unit 17B.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that bear numbers have increased and there is heavy bear predation on moose resulting in fewer moose for hunters. This is then used to request a control program to reduce bears with the expectation that more moose will be available to hunters.

We suggest that any new bear control programs must be based on field studies that validly demonstrate bear predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, wolf predation or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

There, moose were estimated at 850 animals in 2000, down from several thousand two decades earlier. Locals termed it a crisis and demanded a wolf control program. A population of 3000-3500 moose was deemed necessary to sustain a harvest of 135-150 required for local subsistence needs. However, a moose census in 2001 revealed a moose population of about 3600, more than necessary to provide enough harvested animals per year for local residents. The 2000 moose population estimate (850) was based on poor data obtained during marginal census conditions that resulted in a drastic underestimate of true population size. This is an example of local reliance on anecdotal or poor information that may be used to justify unnecessary predator control programs.

We should not repeat the mistakes made at McGrath when considering the problems in Unit 17B. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

Proposal 50. We oppose this proposal and urge the Board to not adopt it.

Proposal 50 if adopted would create a predator control program aimed at reducing brown bears to increase moose for hunters in Units 17B and 17C.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that bear numbers have increased and there is heavy bear predation on moose resulting in fewer moose for hunters. This is then used to request a control program to reduce bears with the expectation that more moose will be available to hunters.

We suggest that any new bear control programs must be based on field studies that validly demonstrate bear predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, wolf predation or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

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We should not repeat the mistakes made at McGrath when considering the problems in Units 17B and 17C. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

Proposal 68. We oppose this proposal and urge the Board to not adopt it.

Proposal 68 if adopted would create a predator control program aimed at reducing wolves to increase moose for hunters in Units 17B and 17C.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that wolf numbers have increased and there is heavy wolf predation on moose resulting in fewer moose for hunters. This is then used to request a control program to reduce wolves with the expectation that more moose will be available to hunters.

We suggest that any new wolf control programs must be based on field studies that validly demonstrate wolf predation is limiting moose population growth rather than other factors including heavy hunting, poor habitat, bear predation or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

In Unit 19D(East), moose were estimated at 850 animals in 2000, down from several thousand two decades earlier. Locals termed it a crisis and demanded a wolf control program. A population of 3000-3500 moose was deemed necessary to sustain a harvest of 135-150 required for local subsistence needs. However, a moose census in 2001 revealed a moose population of about 3600, more than necessary to provide enough harvested animals per year for local residents. The 2000 moose population estimate (850) was based on poor data obtained during marginal census conditions that resulted in a drastic underestimate of true population size. This is an example of local reliance on anecdotal or poor information that may be used to justify unnecessary predator control programs.

We should not repeat the mistakes made at McGrath when considering the problems in Units 17B and 17C. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

Proposal 69. We oppose this proposal and urge the Board to not adopt it.

Proposal 69 if adopted would create a predator control program aimed at reducing predators to increase moose and caribou for hunters in Units 9 and 17.

As with many proposals generated by local Fish and Game Advisory Committees, this proposal contains only anecdotal claims that predator numbers have increased and there is heavy predation on moose and caribou resulting in fewer ungulates for hunters. This is then used to request a control program to reduce predators with the expectation that more moose will be available to hunters.

We suggest that any new predator control programs must be based on field studies that validly demonstrate predation is limiting moose population growth rather than other factors including heavy

hunting, poor habitat, or severe winters. Anecdotal information is insufficient to trigger control programs as was demonstrated in McGrath in 2000 and 2001.

In Unit 19D(East), moose were estimated at 850 animals in 2000, down from several thousand two decades earlier. Locals termed it a crisis and demanded a wolf control program. A population of 3000-3500 moose was deemed necessary to sustain a harvest of 135-150 required for local subsistence needs. However, a moose census in 2001 revealed a moose population of about 3600, more than necessary to provide enough harvested animals per year for local residents. The 2000 moose population estimate (850) was based on poor data obtained during marginal census conditions that resulted in a drastic underestimate of true population size. This is an example of local reliance on anecdotal or poor information that may be used to justify unnecessary predator control programs.

We should not repeat the mistakes made at McGrath when considering the problems in Units 9 and 17. There is no substitute or shortcut for valid field studies prior to creating a predator control program so that limiting factors are identified and ranked in order of importance. Predation is not a universal limiting factor for moose populations across Alaska.

The board of game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claims nor its proposed outcome.

Proposal 75. We *oppose* this proposal and urge the Board to not adopt it.

Proposal 75 if adopted would allow brown bears in Unit 13 to be taken over bait stations as part of the predator control program to reduce predators and increase moose for hunters.

There are many valid reasons for continuing the long-standing prohibition on baiting brown bears including the fact that baiting (feeding) bears habituates them to humans and may lead to more bears injuring or killing people, and to increased property damage.

There is no valid evidence indicating that allowing baiting will ultimately result in more moose for hunters. Indeed, hunters that normally stalk bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of hunters and no increase in bears harvested. Despite vastly liberalized brown bear regulations over the past 20 years, bear numbers in Unit 13 have not declined, nor have more moose been taken by hunters. There is no reason to believe that further liberalization in the form of legalized baiting will work. This proposal lacks any scientific justification.

Proposal 113. We *support* this proposal and urge the Board to adopt it.

This proposal if adopted would create an experimental control area in Unit 13A as part of the predator control program in Unit 13.

Proposal 113 highlights an important deficiency in the predator control programs approved by the Board starting in 2003, namely the failure to follow recommended protocols for designing control programs as experiments as recommended by the 1997 National Research Council Review of predator control in Alaska. Absent such protocols, we cannot determine the success or failure of predator control in increasing ungulate harvests by hunters.

Accordingly, for Unit 13 after 6 years of wolf control, we are unable to determine whether or not the program is working despite premature claims of success by ADF&G. This is largely because no experimental control area(s) was established, i.e., no area(s) was free of wolf control and monitored to assess moose population trends there compared to areas where wolves were reduced. If moose increased in Unit 13 following wolf control it is not valid to claim that such increases were due to reducing wolves as several other factors may have accounted for the increase including mild winters, improved habitat, less bear predation or reduced harvests. An experimental control area(s) where moose did not increase would provide the only valid proof that control worked.

As proposal 113 indicates, it is not too late to modify the Predator Control Implementation Plan to establish an experimental control area in Unit 13A where wolf control would cease. We urge the Board to take this important step so that an NRC warning would be heeded—most predator control programs have uncertain outcomes due to inadequate monitoring and evaluation protocols. Failure to adopt Proposal 113 would lead to the unfortunate result of never being able to say with confidence that predator control did or did not work.

Proposal 114. We *oppose* this proposal and urge the Board to not adopt it.

This proposal if adopted would change the boundary of the predator control program in Unit 13E.

This proposal, as so many like it, lacks any scientific data to back up its assumptions. There are no ADF&G reports to indicate that excessive wolf predation on moose calves occur along the west boundary of 13E. Nor, does the individual cite any reference to moose population estimates that indicate predator control is even necessary in this area.

When the predator control program was expanded to include most of Unit 13E the Board carefully considered where the boundaries should be placed. We think it unwise to now change the boundary and expand the area after the program has been in effect for several years. We urge the Board to retain the present boundary.

Proposal 153. We *oppose* this proposal and urge the Board to not adopt it.

Proposal 153 would establish a predator control program on the Kenai Peninsula aimed at reducing wolves and increasing moose and sheep for hunters.

There is no recent biological information indicating excessively heavy wolf predation on moose in Units 7 and 15, nor is there any reason to believe that reducing wolves will result in more moose and sheep for hunters. The proposal cites no calf mortality studies in Units 7 or 15 that indicate excessive predation by wolves on moose or sheep in these GMUs.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on wolves have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that wolf predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce wolf numbers.

Proposal 154. We *oppose* this proposal and urge the Board to not adopt it.

Proposal 154 would establish a predator control program in Units 15A and 15C aimed at reducing wolves and bears and increasing moose for hunters.

There is no recent biological information indicating excessively heavy predation on moose in Units 15A and 15C, nor is there any reason to believe that reducing predators will result in more moose for hunters. Once again, there are no calf mortality studies to support these assumptions. Predator control has never been shown scientifically to be capable of maintaining a “proper biological balance” that “results in a healthy, sustainable population of moose, brown bears and wolves.” Gambling our wildlife resources on non-scientific propaganda policy protocols is not the mandate of the board of game, nor in the best interests of the residents of Alaska.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the Board should not attempt to further reduce predator numbers.

Proposal 166. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would modify the predator control program in Unit 16B to allow baiting of brown and black bears all summer and allow the use of snares to take black bears. The goal, as stated, is to increase the harvest of black bear sows and cubs.

The Unit 16 Predator Control Implementation Plan’s aggressive means of harvest for sows and cubs is not effective and needs to be removed, not further liberalized. Implementation of such drastic methods of harvest such as unlimited harvest combined with the legal sale of hides must be based on the most current peer-reviewed scientific standards and traditional harvest records indicating both the need and effectiveness of harvesting this segment of the black bear population.

In 2008, the first year for the black bear predator control program in Unit 16, the harvest of black bears increased by just 51 bears over the previous season. In the year prior to establishing an IM plan for black bears in Unit 16, the year 2007, a total of 414 black bears were harvested under the general hunting regulations. In 2008 the harvest of black bears is approximately 465 bears, an increase of only 51 bears. Only 8 of those black bears were cubs. We can assume, at minimum, 4 sows were also harvested to get those cubs. This amounts to an increase of 12 bears that were harvested under the most liberalized sow and cub black bear means and dates of harvest regulations ever allowed in a predator control program. Such a small overall harvest increase by targeting females and cubs, a little over 1% of the harvest objective, clearly does not justify such liberal, unscientifically justified, means of harvest. Certainly expanding this program to allow unlimited snaring of black bear sows and cubs during the summer months lacks any reasonable justification based on science.

Harvest data clearly indicates that the overall harvest of black bears in 2008 simply shifted from sport hunting to predator control harvesting. This fact clearly indicates that the liberal sport hunting regulations that were in place prior to the Intensive Management Plan for Unit 16 were just as effective at both attracting the maximum number of hunters and producing the maximum rate of harvest for this unit without the option of killing black bear sows and cubs. In addition, large male bears were still by far the dominate harvest component, indicating that the regulation allowing harvest of sows and cubs is not

effective at attracting hunters or increasing overall harvest. Hunters participating in the predator control program overwhelmingly preferred to harvest trophy bears which are large male bears.

There is no valid evidence indicating that allowing baiting for bears will ultimately result in more moose for hunters. Indeed, hunters that normally stalk brown bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of hunters and no increase in bears harvested.

In addition, the Board has never addressed nor discussed the negative impacts of killing black bear sows and cubs to vital industries that rely on our wildlife resources in Unit 16, in particular, the tourism industry, which is a substantial component of the economy in Unit 16. For example, there are many lodges in Unit 16, including along the Chuit River that offer bear viewing opportunities to residents and non-residents. The potential impacts to those businesses do not justify the continuation of a harvest method that is not conducive to achieving the goals of the program. Nor do they justify expanding the program to allow the snaring of bears during the high use summer months for a wide range of recreational user groups.

The entire Unit 16 predator control program is based on excessive, unrealistic predator harvests that are justified using predator population estimates that are based on anecdotal data with little scientific validity. Moose calf mortality studies are limited in both scope and breadth.

Predator prey relationships are poorly understood in Unit 16. Limited field data indicates that black bears are the largest source of moose calf mortality in this area. In addition, ongoing field data indicates only a small subpopulation of black bears seem to have “acquired” the habit of focusing on moose calves. Broad predator control programs that target large percentages of the “estimated” predator population over very large areas are ineffective as well as extremely risky.

To make matters even worse, the program is designed without any “control” areas. These are the most basic and essential components for any reasonable scientific evaluation of the success of the predator control program.

Removing large percentages of the region’s predators, especially keystone predators, will have significant impact on the entire ecosystem. Simply counting moose and estimating a possible trend base on a basic “survey” of the population does not support the success of the program scientifically. To date, not one published review of the predator control programs developed since 2004 have been created.

Snares for bears would be set during the non-winter months when bears are active. These are not the months when furbearer snares are set. Snares set for bears would likely catch many non-target species including moose. Should a sow black or brown bear be snared there would be potential significant risk to the public.

We doubt that significantly more bears would be taken by snaring if it was legal, and doubt that additional ungulates would be available to hunters as a result of adopting this proposal.

There are many valid reasons for continuing the long-standing prohibition on baiting brown bears including the fact that baiting (feeding) bears habituates them to humans and may lead to more bears injuring or killing people, and to increased property damage.

There is no valid evidence indicating that allowing baiting will ultimately result in more moose for hunters. Indeed, hunters that normally stalk brown bears will likely substitute baiting for stalking with no increase in total hunting pressure or number of hunters and no increase in bears harvested. There is no reason to believe that further liberalization in the form of legalized baiting will work.

Bear baiting during summer may result in bears injuring humans when they encounter bait stations with bears nearby. Hikers, berry pickers, boaters and fisherman using the country during summer are apt to encounter bait stations, many of which are unused by hunters except on weekends. Bait stations without a hunter present with sows and cubs nearby are especially hazardous. Brown bears are known to aggressively defend food sources and may attack humans as a result.

We suggest that bear baiting during the summer months is a dangerous practice and unwarranted. We urge the Board to not allow it.

Proposal 168. We *oppose* this proposal and urge the Board to not adopt it.

Proposal 168 would amend the Unit 16 predator control program to expand the regulatory text to allow same-day airborne hunting and transport to black bear baiting stations to specifically say “including helicopters. In addition, the proposal would, for the first time, allow youth to participate in predator control programs, liberalize the predator control bait station regulations to allow anyone participating in the program to hunt anyone’s bait station and, for the first time, allow non resident participation in a predator control program.

Youth participation:

Participation in a one of the states predator control programs requires an individual to sign a legally binding document, a predator permit. The state has long asserted that this is not a hunting opportunity, to be enjoyed using fair chase principles. The states position is that predator programs are a “control” effort using “adult” citizens instead of biologists to kill large percentages of a predator population in any given area. Harvest of meat for consumption and quality of hides is not considered in predator control program as stated by the Board of Game. Youth, under the age of 16 years, cannot sign a legally binding document and cannot, by law, participate in any program that requires such an “agreement” between the individual and the state. The Board of Game’s policy concerning predator control has long stated that predator control programs do not promote hunting ethics or our hunting heritage, thus they are definitely not appropriate for a youth.

Use of helicopters:

As you know the Board of Game has already authorized the use of helicopters in Unit 16’s predator control program. An act that is so aggressive, unpopular with the citizens of Alaska, and unjustified that the ADF&G has actually been forced to use their nearly atrophied muscle for a little push back to the Board of Game’s strictly political mandates and non scientific management protocols that have occurred since the Murkowski administration fired the entire board and appointed his own “version” of representation for Alaskan’s on the Board of Game. The requested regulatory language change is not in response to a biological need, but a deplorable attempt to continue to force a political agenda on the ADF&G, regardless of their strong opposition. Since the Murkowski “readjustment” the Board of Game has considered the ADF&G its tool to manipulate and ignore at will. These proposals attempt to “mandate” the conditions of a predator control permit, further restricting the ADF&G’s ability to manage with the best available science with the flexibility to use adaptive, case by case, management strategies.

The ADF&G has refused to allow helicopter use in the conditions of a predator control permit, or should we say “contract”, regardless of the Board of Games authorization, and for good reason. The biological risk to the wildlife populations is so excessive and the enforcement challenges are so significant that it does not warrant their use. Helicopters allow unlimited access to any location in the region and to 100% of the wildlife resources. In addition, the permit would allow an individual to land and shoot black bears, encouraging the illegal chasing and harassing of black bears, especially the highly coveted “trophy” bears. Enforcement of regulations would be chronically undermined even further by requiring state wildlife troopers and the Big Game Commercial Services Board investigator to be forced to rely on the states limited supply of helicopters. Using helicopters to fly in people and equipment would promote illegal landing strip “improvements” for fixed wing aircraft in remote, previously inaccessible, regions as well, allowing even further degradations to the wilderness ecosystems.

Non-resident participation:

Once again, this is not a “hunting” opportunity for out of state sport or trophy hunters. Predator control programs are a “contract” between residents and the state of Alaska that does not address fair chase, hide or meat quality as stated by the Board of Game. Non resident participation occurred last year due to a close door, last minute decision by the ADF&G to change the long held policy, for the first time, to allow a general sport hunt to coincide with a predator control hunt. The general sport hunt allowed non resident participation under the state wide regulations for non resident baiting and other hunting methods for bears. These regulations have long been in place for non resident hunters. The proposal is simply yet another deplorable attempt by Aaron Bloomquist, the Chairman of the Anchorage AC, to promote his commercial hunting interests in Unit 16.

Extending the baiting season into the summer months:

Bear baiting during summer may result in bears injuring humans when they encounter bait stations with bears nearby. Hikers, berry pickers, boaters and fisherman using the country during summer are apt to encounter bait stations, many of which are unused by hunters except on weekends. Bait stations without a hunter present with sows and cubs nearby are especially hazardous. Brown bears are known to aggressively defend food sources and may attack humans who approach them.

We strongly urge the Board to reject all aspects of this proposal.

Proposal 171. We *oppose* this proposal and urge the Board to not support it.

This proposal would allow trapping of black bears as part of the Unit 16B predator control program to reduce predators and increase moose for hunters.

Trapping and snaring of bears have long been prohibited in Alaska. There are many reasons to continue this ban. Steel leg-hold traps large enough to hold bears are a serious danger to humans and likely would be fatal to pets. All but one or two states recognized these dangers decades ago and prohibited trapping of bears.

We doubt that significantly more bears would be taken by trapping if it was legal, and doubt that additional ungulates would be available to hunters as a result of adopting this proposal. The benefits would likely be small compared to the costs and risks to human safety.

Using traps or snares to kill brown or black bears raises serious ethical and humane issues. Catching and holding large powerful and potentially dangerous animals presents a situation where wounding loss and injury can occur, as demonstrated in Unit 4, brown bear tagging and capture programs using snaring along salmon streams as the capture method. Injured bears can escape, resulting in prolonged suffering. Should a cub of any sow bear, either brown or black bear, become snared the potential for significant risk to the public is overwhelming. With regulations like this, public acceptance of hunting will be diminished, adversely impacting responsible hunters.

We urge the Board to not adopt this proposal.

Proposal 187. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would change the boundary and expand the predator control program in Unit 16B.

When the Unit 16B predator control program was expanded to include parts of Unit 16A the Board carefully considered the boundaries. To change the boundary now and expand the area is unwarranted.

The individual promoting the expansion of the predator control program in Unit 16 provides no biological data to support his proposal, nor has the ADF&G.

We urge the Board to retain the current boundaries.

Proposal 188. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would increase the intensive management moose population and harvest objectives for the Unit 16B predator control program.

The Board carefully reviewed the moose population and harvest objectives for this predator control program when it expanded the boundaries to include parts of Unit 16A. This was done with input from ADF&G that provided background information on the biological issues and scientific data on estimated carrying capacity of the region. There is no new information indicating the Board's decisions were flawed and there is no compelling reason to increase the IM objectives now.

We urge the Board to retain the IM objectives contained in the current implementation plan as there is no scientific justification for increasing the harvest objectives in this GMU.

Proposal 189. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would allow helicopters to transport hunters in the Unit 16B predator control program area and allow summer baiting of bears.

Use of Helicopters:

The Board has already authorized the use of helicopters in the Unit 16 predator control program. The requested regulatory language change is not in response to a biological need, but a deplorable attempt to continue to force a political agenda on the ADF&G. This proposal attempts to mandate the conditions of a predator control permit, further restricting the ADF&G's ability to manage with the best available science and with the flexibility to use adaptive, case by case, management strategies.

The ADF&G has refused to allow helicopter use in the conditions of a predator control permit regardless of the Board's authorization and for good reason. The biological risk to the wildlife populations is so excessive and the enforcement challenges are so significant that it does not warrant their use. Helicopters allow unlimited access to any location in the region and to 100% of the wildlife resources. In addition, the permit would allow an individual to land and shoot black bears, encouraging the illegal chasing and harassing of black bears, especially the highly coveted "trophy" bears. Enforcement of regulations would be chronically undermined even further by requiring state wildlife troopers and the Big Game Commercial Services Board investigator to be forced to rely on the state's limited supply of helicopters. Using helicopters to fly in people and equipment would promote illegal landing strip "improvements" for fixed-wing aircraft in remote, previously inaccessible, regions as well, allowing even further degradations to the wilderness ecosystems.

Extending the Baiting Season into the summer months:

Bear baiting during summer may result in bears injuring humans when they encounter bait stations with bears nearby. Hikers, berry pickers, boaters and fisherman using the country during summer are apt to encounter bait stations, many of which are unused by hunters except on weekends. Bait stations without a hunter present with sows and cubs nearby are especially hazardous. Brown bears are known to aggressively defend food sources and may attack humans who approach them.

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We urge the Board to not support this proposal.

Proposal 190. We *oppose* expanding the options for intensive management and wish to provide comments on the general concept of allowing additional options for intensive management.

This proposal solicits public comments but proposes no specific regulatory changes.

In June 2008 ADF&G killed 14 wolf pups in or near dens as part of a predator control program on the Alaska Peninsula. This created a storm of public protest. Questions were raised about the legality of wolf "denning" by ADF&G when this practice was specifically prohibited for individuals and agencies. Ethical objections were raised over the practice of killing helpless young pups, even if that action was part of a predator control program. These issues have yet to be fully and finally resolved. The ADF&G has even refused to provide details of how they killed 9 pups in their den.

Proposal 190 now mentions the use of carbon monoxide cartridges "as an option for euthanasia of wolves by government employees." We assume this means killing young wolf pups at dens by means of these cartridges.

We oppose killing of helpless young wolf pups at dens by any and all means, including digging out dens, flooding dens, smoking out dens, or mechanically removing pups with twisted barbed wire or fish hooks. The use of carbon monoxide is no better or more humane than any of the other techniques despite its efficiency. In reality, carbon monoxide is poison gas that acts slowly to deprive the body of oxygen as it kills.

We specifically oppose the practice of denning and generally oppose expanding the arsenal of heinous techniques that are used to kill wolves. Alaska, in adopting additional, highly controversial methods of killing wolves, is dangerously close to being viewed as waging an inhumane war on a rare species that in most of the world is being conserved, protected and restored after centuries of persecution by humans.

We are surprised that ADF&G would be grossly insensitive to the concerns of millions of people worldwide, and we think it would be a serious mistake for the Board to authorize the use of poison gas to kill young wolf pups in dens at this time. Surely, the existing techniques for killing wolves are sufficient to accomplish the objectives of the wolf reduction programs. We need not resort to poison gas.

Proposal 192. We *oppose* this proposal and urge the Board to not adopt it.

This proposal if adopted would allow wolves and bears to be taken with helicopters in the Unit 16B predator control area.

There are many reasons to continue the long-standing prohibition on using helicopters to transport hunters or for private pilots to shoot wolves and bears. Legal use of helicopters for transport and shooting would encourage excessively large harvests as there are virtually no places that helicopters cannot access. Thus, there would be no refugia for bears and wolves with the possibility of over-harvest. Although the Unit 16B program is designed to reduce bear and wolf numbers, it is not designed to eliminate predators over vast areas.

The predator control program relies on anecdotal and extrapolated information to estimate wolf and bear numbers. The goal of the program is to reduce predators by as much as 80%. Such aggressive harvest rates should not be combined with the use of helicopters that allow unlimited access to the region. The potential to overharvest predators is far too great.

Many members of the public believe that hunters should operate under rules of fair chase especially when pursuing trophy species like bears and wolves. They do not consider predator control programs conducted by private hunters as exempt from fair chase. Helicopters represent the antithesis of fair chase to many ordinary people who might otherwise support predator control.

Proposal 200. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would exempt bears taken in predator control areas from annual bag limit restrictions in other areas.

Resident bear hunters in Alaska now have the opportunity to harvest large numbers of bears by hunting in the areas where predator control programs were adopted as well as in other areas. In recent years the Board has greatly liberalized bear seasons and bag limits and waived resident tag fees. The emphasis on bears as predators of ungulates and the need to reduce bears in order to increase ungulates for hunters has diminished the status and image of bears as trophy species. Further liberalization of bear hunting regulations is unwarranted at this time. If hunters choose to fill their bag limits by hunting in predator control areas, that decision might correctly affect their option to hunt in other areas. We see no reason to alter this fact.

Proposal 235. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would extend the Unit 19A predator control program six years.

As with the other predator control programs adopted by the Board starting in 2003, the Unit 19A program was not based on adequate preliminary information obtained from field studies. Such studies were recommended by the National Research Council Review (published in 1997) in order to meet their recommended standards designed to avoid unnecessary control programs based on unsound science. The purpose of conducting field studies is to properly justify control programs by documenting that predation is limiting prey populations rather than other factors including poor habitat, over-hunting and severe winters. Decades of research have shown that predation is not a universal limiting factor for moose populations in Alaska and it cannot be assumed that predator control will recover a depressed prey population in every case.

After several years of reducing wolves in Unit 19A, the Board is now faced with ending the program or renewing it. We suggest that before renewing it ADF&G should conduct a valid analysis of the available data to determine whether or not the program is working. The results we have seen thus far raise doubts about the success of this program. This brings into question the original justification for the program. If wolf predation was not the main limiting factor for moose at the outset, it is not surprising that moose numbers did not increase following reduction of wolves.

If the Board opts to renew the program we strongly suggest that valid monitoring and evaluation protocols be added to the implementation plan so that the success or failure of the program can be determined. The NRC review emphasized that many past predator control programs had uncertain outcomes because monitoring and evaluation were inadequate. The lack of adequate protocols in the current programs, if not remedied, will repeat the mistakes of the past.

Proposal 236. We *oppose* this proposal and urge the Board to not adopt it.

This proposal if adopted would extend the predator control program in Unit 19D(East) five years.

The wolf control program in GMU 19D(East) is now in its 6th year. The initial justification for the program (that subsistence demand for moose was unmet) was flawed. Wolf control since 2003 has not produced more moose for hunters. The scientific value of the experiment has been lost. Valid monitoring and evaluation protocols are absent and costs of removing wolves are excessive. These facts indicate that the Board of Game should immediately terminate this wolf control program.

In March, 1995 the Board of Game (BOG) approved a wolf control program for the McGrath area (GMU 19D(East)) designed to reduce wolf numbers in that area by 80% in order to increase moose numbers to benefit hunters. This was in response to reports that the moose population had declined from several thousand in the 1970s to much lower numbers and wolves had increased greatly. However, the control program was not implemented at that time.

In 1999, the BOG again passed a wolf control program after local residents reported that moose numbers continued to decline. Again, the program was not implemented.

In 2000, Governor Knowles appointed a planning team to review the information and issue recommendations to the ADF&G). The team determined that a harvest of about 150 moose per year

was required to meet subsistence needs of local residents and a moose population of about 3,500 was necessary to sustain the annual harvest. The planning team was told by ADF&G that only about 850 moose remained in the area and a crisis existed. The team recommended that bears and wolves be reduced and the hunting season in a portion of the area be closed in order to re-build the moose population. ADF&G accepted the recommendations and the BOG adopted them in spring 2001.

In November 2001, ADF&G conducted a moose census in the area that estimated a moose population of about 3,600. This indicated that previous censuses that estimated much lower numbers were in error. Plans to reduce predators were suspended because the estimate of 3,600 moose exceeded the estimate of about 3,500 needed to satisfy harvest demand.

In March 2003, a new BOG appointed by governor Murkowski revisited the issue and approved a control plan featuring aerial shooting of wolves in a portion of the area and a bear translocation effort. The BOG subsequently raised the intensive management moose population objective from 3,000-3,500 to 6,000-8,000. ADF&G staff reports to the BOG indicated that U.S. Census Bureau data showed the human population in the area declined from 868 in 1990 to 564 in 2000 thereby lowering the subsistence demand for moose. The fall 2002 moose harvest estimate was 100 based only on legally taken moose voluntarily reported by successful hunters.

A 2003 lawsuit challenging the McGrath predator control program revealed problems related to accurately estimating moose harvests (and thus determining whether or not intensive management objectives were met—one of the triggers for a control program). One problem was the magnitude of the unreported legal harvest. The planning team found that prior to 2001, for every 50 moose reported another 40-50 were probably taken legally but not reported. A second problem is the illegal (obviously unreported) harvest. ADF&G data from McGrath based on radioed animals indicated that 35 of 98 moose were killed legally by hunters and 12 were taken illegally. This indicates a ratio of about one illegally taken moose for every three legally taken. Thus, this information indicates that unreported legally taken moose may be as high as 100% of the reported harvest and illegally taken moose add an additional 30%.

This analysis indicates that the fall 2002 actual moose harvest likely exceeded 200 animals, much higher than previously estimated based only on the reported harvest. This, combined with the human population decline in the area, indicate that the BOG's finding that subsistence demand for moose in 2003 was not being met was likely in error. The finding that subsistence demand was unmet and intensive management harvest objectives were not achieved was the primary justification the BOG used to erroneously adopt a predator control program in 2003.

Predator control at McGrath began in fall 2003 and extends to the present time. Bears were translocated in the springs of 2004 and 2005 during moose calving season. Wolves were shot each winter. Following the bear translocations, moose calf survival from birth to November doubled. In the bear removal, area November calf:cow ratios were 51-63 calves per 100 cows—much higher than previously. This occurred primarily in a 520 square mile area termed the Experimental Micro-Management Area (EMMA). This was only a small portion of the 8,500 square miles in GMU 19D(East). Wolves were shot in an area of about 3,200 square miles (expanded to 6,245 square miles in 2006). The moose hunting season was closed in the EMMA in order to rebuild the moose population quickly.

In November 2004, another moose census was attempted but poor snow conditions terminated it before it was completed. An ADF&G memo summarizing the census data warned that extrapolating the 2004 data from the limited area censused to the entire area was not warranted. However, this was done with the resulting claim that moose numbers increased from 2001 to 2004. The invalid 2004 estimate (4,374) was compared to the intensive management population objective (6,000-8,000) to claim that the objective was unmet and therefore predator (wolf) control should continue.

No moose population censuses have been done since 2004 and the current number of moose in the entirety of GMU 19D(East) is unknown. Despite increased early calf survival following bear translocation, many of the calves "saved" from bears starved in the very severe winter of 2004-2005. ADF&G estimated that moose increased 30% in the EMMA (only 6% of the entire unit) mainly as a result of moving bears and closing the hunting season. Only 45 wolves were reported taken by aerial shooters between 2003 and 2007 including only 7 in 2007 from a population estimated at 98. There is no evidence that significantly more moose are now available to hunters in the 94% of the area outside the EMMA as a result of wolf control. With the small number of wolves taken recently by aerial hunters there is no indication that continuing wolf control will benefit hunters in the future.

Unfortunately, the main factor(s) responsible for the increases in calf:cow ratios and overall moose densities in the EMMA cannot be identified. At the May 2006 BOG meeting, BOG members and Department staff agreed that the scientific value of the McGrath predator control program was lost due to the way the program was conducted. Bear translocation, wolf reduction, and closure of the moose hunting season were all initiated at about the same time. As a result, it is not possible to determine which of these variables (or indeed, which other variables) are most important in producing observed changes in the moose population. The National Research Council Report (1997) strongly recommended that predator control programs be done so that results are clear. Unfortunately, the Committee's advice was not followed for the McGrath program.

Of the five currently active predator control programs in Alaska, the GMU 19D(East) program has the most complete data and has received the most effort by ADF&G to gather field data. Unfortunately, the study plan prepared in 2001 by ADF&G and peer reviewed by scientists inside and outside Alaska was shelved in 2003 when the new BOG approved the control program. Thus, the scientific protocols to adequately monitor and evaluate the results over time are not being implemented. This, in part, resulted in ADF&G and BOG agreement that the scientific value of the program was lost. It also argues against continuing wolf control. If, when control ceases, we cannot properly determine success or failure, why continue the highly controversial practice of aerial shooting?

The 19D(East) program is also the only one for which ADF&G has provided cost figures. Total expenditures 2 years ago were estimated at \$1.7 million. Surely, these have now risen. If 45 wolves were taken from 2003 to 2007, the state's cost per dead wolf was nearly \$38,000, not including the costs incurred by the aerial shooters or the public relations costs to the state due to the negative image of aerial hunting. Of course, we are well aware that much of the total cost was spent on activities not related to shooting wolves but ADF&G has not provided cost figures specifically for that activity.

What benefits have resulted from the cost of wolf removal? As stated above, there is no evidence that significantly more moose are available to hunters outside the EMMA as a result of reducing wolves, and there is no indication that continuing wolf control will produce more moose.

We maintain that the initial justification for wolf control at McGrath in 2003 overestimated subsistence demand for moose and underestimated subsistence harvests. Clearly, the moose population estimates prior to 2001 severely underestimated moose numbers actually present and provoked a “crisis” that never existed. Thus, the justification for wolf control was flawed at the outset.

We maintain that the wolf control conducted since 2003 has not “worked.” It has failed to produce more moose for hunters. The modest gains in moose numbers in the EMMA were due to moving bears during moose calving season and closing the moose season. In the 94% of GMU 19D(East) outside the EMMA there is no evidence that moose have increased as a result of wolf control and no additional moose are being taken by hunters. The reported moose harvest in 2006-2007 throughout GMU 19D was 82, less than the 115 reported in 2002-2003 before wolf control began.

We agree with ADF&G and the BOG that the scientific value of the “experiment” at McGrath has been lost and we are unable to learn anything more there that may guide future programs. Indeed, we will likely be unable to assess whether or not wolf control worked and what factors likely limited the moose population.

We believe that it is most unfortunate that the peer reviewed study plan for McGrath was shelved before it was implemented in 2003. Now, in the absence of scientifically valid protocols to monitor and evaluate the program, one of the National Research Council’s main recommendations has been breached—that the programs should be conducted so the outcomes are clear. A recent letter of concern by nearly 200 scientists sent to Governor Palin echoed this concern. In the absence of monitoring and evaluation protocols that compromise scientific validity, and with failure to accomplish management goals (more moose for hunters), the McGrath program appears to be a total failure.

We find that the costs of wolf control at McGrath are excessive, especially since control has not produced more moose for hunters. Continuing wolf control would expend more funds that might be better used for programs that have tangible benefits.

These facts provide strong justification to terminate wolf control at McGrath immediately and we strongly urge the BOG to so.

Proposal 237. We *oppose* this proposal and urge the Board to not adopt it.

This proposal would further liberalize bear regulations in the Unit 20E predator control program and establish a working group to recommend additional actions to reduce bear numbers.

Harvest of Sows and Cubs:

In 2008 the Board of Game authorized the harvest of sows and cubs in Unit 16. Harvest records clearly indicated that the regulation did not result in increased bear harvest. Hunters continued to prioritize for large male “trophy” bears. The public strongly opposes the hunting of sows and cubs.

Use of snares for killing bears:

Snares set for bears would catch many non-target species including moose.

Should a cub of any sow bear, either brown or black bear, become caught in a snare the potential for significant risk to the public is overwhelming.

Snaring brown bears has been proven ineffective in a recent brown bear capture program conducted by the ADF&G in southeast Alaska. Injured brown bears pose a significant safety risk to the public.

The public strongly opposes snaring of bears.

Sale of bear hides:

The State Wildlife Troopers have always recommended against allowing the sale of bear parts. Regulatory statutes are insufficient and incapable of ensuring legality of bear hides, especially in regards to location of harvest. The Board of Game has repeatedly ignored the advice of the state wildlife troopers and supported what many feel are regulations that promote “poaching” of bears for sale and profit. The Board of Game should listen to the advice and recommendations of the State Wildlife Troopers and defer to their knowledge and experience.

Same day airborne hunting:

Virtually unenforceable and highly unpopular with the citizens of Alaska. Promotes the hunting of trophy bears by air, running them to exhaustion and then landing to shoot.

Working Groups:

If a working group is established we request that it include members from conservation and environmental groups—these are excluded from the list of potential members included in the proposal. We also request that biological input to the working group come from biologists outside ADF&G to ensure objectivity.

Proposal 238. We *oppose* this proposal and urge the Board to not adopt it.

This proposal if adopted would create a wolf control program in Unit 21E.

Please see our comments on proposal 239.

Proposal 239. We *oppose* this proposal and urge the Board to not adopt it.

This proposal if adopted would create a wolf control program in Unit 21E.

The draft implementation plan in the proposal indicates a lack of field studies demonstrating that wolf predation is a major limiting factor for moose in Unit 21E. Absent such studies it cannot be assumed that reducing wolves will ultimately increase moose numbers and benefit hunters. Over-hunting, bear predation, poor habitat or severe winters, rather than wolves, may be limiting moose population growth. If so, removing wolves would have no effect. Wolf predation cannot be assumed to be a universal limiting factor for moose across all of interior Alaska.

We suggest that the Board require ADF&G to conduct adequate field studies to identify major limiting factors of moose in Unit 21E before debating this proposal.

The draft implementation plan indicates that moose numbers in Unit 21E have not declined to very low levels and labels the control plan as “proactive” in the hope that it might prevent such a decline. If wolf control is not currently limiting moose, controlling wolves will not be proactive in preventing a moose decline. The only way to assess the likely outcome of reducing wolves is to demonstrate at the outset

whether or not wolf predation is limiting moose population growth. This proposal merely assumes wolves to be limiting moose. That is insufficient justification for a wolf control program.

6. MISCELLANEOUS

Proposal 221. We *support* this proposal and urge the board to adopt it.

This proposal if adopted would extend the time that hunters are restricted from hunting after flying.

We consider this proposal an opportunity to further enhance fair chase hunting and we urge the Board to adopt it.

Thank you for giving our comments your thoughtful consideration.

Sincerely,

Wade Willis
Alaska Representative