



Audubon ALASKA

RC 67

308 G Street, Suite 277

Anchorage, AK 99501

Tel: 907-276-7034

Fax: 907-276-5069

www.audubon.org

December 5, 2003

Alaska Board of Game
Boards Support Section
1300 College Rd.
Fairbanks, AK 99701
907-474-8558

Re: Predator control in Units 13 and 16B

Dear Board Members:

On behalf of Audubon Alaska, I would like to offer the following comments and recommendations as you consider regulations on predator control in Game Management Units 13 and 16B.

16B: There is insufficient data on wolf, bear, and moose populations in 16B to justify a predator control area in this unit. Survey and inventory data are very limited in this area and the department's understanding of predator-prey relationships there is also limited. It is my understanding that basic moose survey information has been lacking in this area for several years and wolf surveys of this area have never been done in a systematic way. Since the board has already liberalized seasons and bag limits for wolves and bears in this unit, it would be irresponsible to authorize additional predator controls in this area without additional data. It is also my understanding that ADF&G does not support additional predator control in this area. I concur with the department and recommend that the board defer passing additional control measures in Unit 16B.

13: A recent press release (11-4-03) by the Commissioner of Fish and Game states, in part, "The habitat in the Nelchina Basin will support more moose. Pregnancy and twinning rates are high, calves are produced but 70-90 percent of them are dead in less than five months after they are born. Predation by bears and wolves is the reason."

I believe that this statement is in error. Department and other scientists with detailed knowledge of the ecology of Unit 13, indicate that twinning rates are actually very low, suggesting that the moose population may be approaching carrying capacity. Further, recent studies have suggested that the nutritional quality of willow forage in Unit 13 may be at levels low enough to influence moose reproduction. In 1997, the National Research Council reviewed the relationships of wolves, bears, and their prey in Alaska. Among other findings, they concluded that data on habitat quality are inadequate. It now appears that the board will make decisions about predator control in Unit 13 on the assumption

that "Habitat in the Nelchina Basin will support more moose." This is clearly in divergence with the most recent scientific findings in this area.

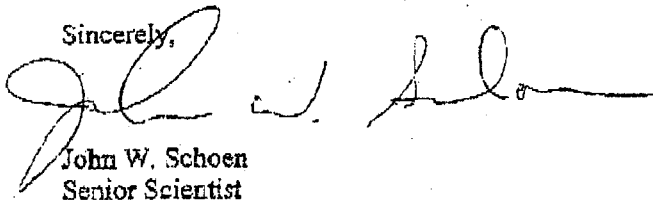
I recommend that the board work with the department to carefully evaluate the habitat conditions in Unit 13 prior to making a decision on wolf control in this unit.

Other comments:

Aerial wolf control in Alaska is very controversial and divisive. The costs of conducting aerial predator control go far beyond the economic costs. I strongly recommend that the board consider the implications these extraordinary management actions will have on the credibility of hunting, wildlife management, and Alaska in general. Do the gains in additional moose outweigh the costs both economically and in terms of public credibility? These are serious considerations to factor into these important decisions.

Thank you for the opportunity to comment.

Sincerely,



John W. Schoen
Senior Scientist

Cc: Matt Robus

RC54

November 11, 2003

To: Alaska Board of Game

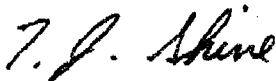
From: T.J. Shine
POB 874895
Wasilla, Ak. 99687

Re: Wolf Control

Thirty years of personal observation has convinced me that elimination of the majority of the current wolf population from game management unit thirteen is absolutely necessary to avoid a biological disaster there. The existing imbalance in the predator / prey ratio, if not addressed immediately, will result in a catastrophic, potentially generations long shortage of both wolves and the ungulates upon which they prey. The end of wolf control measures such as aerial hunting and land and shoot marked the beginning of a long decline in Moose and Caribou stocks. A fast breeding wolf population proliferated unchecked. Refusal by Past State Administrations to allow our Fish and Game professionals to use such management tools, knowing that they are the only truly effective ones, was unconscionable. It amounted to abrogation of responsibility for the well being of the animals, both predator and prey, and of the humans who depend on them.

Consumptive and non-consumptive users alike will benefit from increased animal populations in unit thirteen. The means to that end is clear and incontrovertible. I implore you, from the bottom of my heart, to allow professionally managed aerial wolf control to go forward in game management unit thirteen.

Sincerely,



T.J. Shine

Dec-19-2003 03:52pm From:ADNR OHMP FBKS

19074563081

T-623 P.005/009 F-662

RC94

Alaska Board of Game
Boards Support Section
1300 College Road
Fairbanks, AK 99701

November 12, 2003

Re: Comments on GMU 13 Predator Control Project

We request the Board authorize aerial shooting by the public using fixed wing and helicopter aircraft. We also request the Board authorize the use of two way radio communications for those permitted to participate in the Predator Control Project.

The Board took the first necessary step to reduce wolves as one of the most important predators on moose in GMU 13. Lost amid the Department's enthusiasm to "control" the project, the Department and subsequently the Board overlooked the utter failure of previous land and shoot activity. The Department feels that public land and shoot under a carefully conditioned permit using specially qualified pilots will take enough wolves to effect a change in the plunging moose population.

The rationale is that trappers will continue to take wolves, snowmachine hunters will take wolves and the "extra harvest" needed would come from land and shoot.

This approach is wrong and will not work.

The decline of moose in GMU 13 is very nearly a straight line down the graph since 1988. Unfortunately, the Department has failed to show why the mid 1990's land and shoot public hunting had no impact in the downward trend. That program did not require a special, conditioned permit, area restrictions or specially qualified pilots. Previous land and shoot did not increase either the moose calf survival or the moose population.

The goal of the predator control program is to efficiently and humanely reduce wolves to a low enough population to reverse and recover the number of moose. In other predator control projects where wolves were a significant contributor to moose mortality, taking a significant number of wolves stopped the decline and, after a year or two, effected an increase in calf survival to begin an upward trend in the population. The present moose population in GMU 13 is between one half and one third of the population objective, therefore, reversing the downward trend is the MOST important objective.

Previous predator control programs show that the total number of wolves in a control area are usually significantly under-predicted by the ADF&G. No work has been done in GMU 13 to suggest that their stated wolf harvest objective is adequate. The success of the project has to be measured by increased calf survival and a subsequent increase in moose population not by the number of wolves removed.

Dec-13-2003 03:35pm From:ADNR OMRP FBK3

18074583081

T-033 P.006/009 F-002

Increased harvest increases by hunting and/or trapping will not remove the number of wolves necessary in an efficient and humane manner. Aerial hunting using public fixed wing and helicopter aircraft is the most humane, efficient and cost effective method. Even the special interest groups totally opposed to the predator control project stated the efficiency of using helicopters in the recent media.

Allowing participants in the project to use radio communication will also aid efficiency.

We urge the Board to reconsider the restrictions for GMU-12 and allow public aerial shooting by fixed wing and helicopter aircraft and to allow participants to use two way radio communications.

Thank you,

Faithful Fish and Game Advisory Committee
Approved at FAC meeting November 12, 2003.