

## **Defenders of Wildlife**

Testimony before the Alaska Board of Game  
Spring 2008 Meeting – Fairbanks, Alaska  
March 3, 2008

### **Introduction**

Chairman Judkins, members of the Board of Game, Alaska Department of Fish and Game staff, my name is Tom Banks and I am the Alaska Representative for Defenders of Wildlife. I live in Anchorage. Defenders is a nonprofit, membership-based organization dedicated to the protection of all native wild animals and plants in their natural communities. We number about one million members, supporters or subscribers nationwide, and in Alaska, we have approximately 5,800 members, supporters or subscribers.

Defenders' comments are shown in Public Comments (PC) 56 and Record Comments (RC) 70. Our record comments include sixty-four letters sent to us by our members and supporters within a less than a two day period.

Defenders is the author of three proposals before you, 102, 106, and 113, which raise serious concerns and recommend terminating the current predator control programs operating in Unit 19A, Unit 19D (East), and Units 20E/25C. These proposals were jointly submitted by Defenders of Wildlife, the Alaska Wildlife Alliance, and Alaska Center for the Environment (ACE). ACE's members number nearly 7,000. We ask that the Board bring up our proposals for consideration, then allow the Alaska Department of Fish and Game staff an opportunity to give a thorough update on the status of these programs. We can all benefit from basing our opinions on a good factual record.

We object to these predator control programs for numerous reasons, including our doubt that they have produced more moose for hunters. Valid monitoring and evaluation protocols are absent. The costs of removing wolves are excessive. Details regarding Proposal 106 follow. Our reasoning for terminating the other programs is modeled after our comments on this proposal.

### **Proposal 106 – Unit 19D (East) predator control issues**

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. ADFG 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, 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 adopt a predator control program in 2003.

In November 2004, a moose census for Unit 19D(East) was attempted but poor snow conditions terminated it before it was completed. An ADFG 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.

I viewed the Department of Fish and Game research presentation given Friday that shows that bears, much more than wolves, are responsible for predation on the moose calves in the 19D EMMA. It is instructive to utilize research like this to inform which species deserve the greater emphasis in the hunting program or in approved predator control programs. The presentation also shows that aerial control of wolves was most effective in the first two years of application, when a high percentage of wolves killed were by aerial methods. After that, the success dropped off, and regular hunting and trapping were much more effective. This has important implications.

### **Summary comments**

We have had three very full days of staff reports and public testimony already, to which I have listened carefully. In spite of our obvious differences which often gain the most attention, I believe that the Board, the Department, Defenders, and most individuals and groups in this room may share a main common purpose, which is to conserve Alaska's wildlife in perpetuity for the immediate human benefits as well as its long-term ecological benefits. We have been endowed with impressive natural resources over which we have an important stewardship responsibility.

We will support aerial predator control in Alaska only when it falls under strict conditions: when it is necessary to prevent an imminent biological emergency, when it is conducted by wildlife professionals from state or federal agencies, when the action is supported by sound science, when it is economically cost-effective, and when it receives widespread public support.