

September 25, 2007

Governor Sarah Palin
State of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Dear Governor Palin:

As scientists and other wildlife professionals¹, we urge you to strengthen the application of science-based wildlife management to sound policy decisions, especially for those Alaska programs related to predator control. We are concerned with potential problems of managing and conserving large mammalian carnivores and their ungulate prey resulting from recent approval of predator control programs designed to severely reduce populations of gray wolves, black bears and brown bears. We strongly urge the State of Alaska to gather data necessary to justify, implement, monitor and evaluate these programs so that management practices will ensure sustained populations of both predators and prey.

Starting in 2003 Alaska approved and implemented five predator control programs in interior and southcentral parts of the state designed to severely reduce wolves and bears in order to increase numbers of moose and caribou for hunters. These are lethal control programs where private pilots are authorized to shoot wolves with airplanes and hunters and trappers are encouraged to take large numbers of wolves and bears. These programs now total nearly 60,000 square miles of state and federal land. Nearly 700 wolves have been killed to date. The goal for several of these programs is to reduce the wolf populations by 80% of estimated pre-control numbers and to hold them at that level for an undetermined period. This is the largest predator control program since statehood.

Recently, black and brown bears were targeted in one area for reductions of 60% by authorizing hunting methods never before practiced in Alaska. These include shooting of female bears with cubs, or cubs themselves. Liberal bear baiting regulations, year-long open seasons, sale of hides and skulls, same-day airborne hunting and use of airplanes for spotting bears were also approved by the Board of Game.

These actions have drawn the attention of professional wildlife biologists worldwide. We are aware that the American Society of Mammalogists has sent three letters of concern and passed a resolution regarding wolf management in Alaska. Issues surrounding Alaska's predator control were discussed in September 2006 at The Wildlife Society's annual meeting in Anchorage and concerns were raised over the scientific basis of the control programs. These concerns are based on knowing the end result of similar large-scale predator control programs in other areas of the world that were not based on sound science. Often, predators subject to such programs were unable to sustain viable populations.

¹ This letter represents the viewpoints of the individuals listed below. Institutional affiliations are listed for identification purposes only, and do not in any way constitute an endorsement of this letter, nor does this letter necessarily reflect the views and opinions of the affiliated organizations.

The basis of Alaska's recent predator control programs is the state's intensive management law. This law mandates restoring "depleted" ungulate populations to former levels of abundance and setting of ungulate population objectives. We are concerned that objectives were often based on unattainable, unsustainable historically high populations. Accurate determination of habitat carrying capacity was seldom considered. The net result is to perpetually chase unattainable objectives with inadequately designed predator control programs that risk long-term sustainability of ungulate habitat integrity and sustainability of reasonable predator populations.

In 1997, the National Research Council issued a report evaluating past predator control programs in Alaska. Included were many biological and economic standards and guidelines the committee recommended for future programs. We are concerned that many of those standards have not been applied in adopting the current programs. These include quantitative habitat evaluation and monitoring and evaluating protocols to ensure that results of the programs are clear and that adaptive management is used to learn as much as possible.

Accordingly, we strongly urge the State of Alaska to:

- Re-examine the biological basis of existing predator control programs.
- Reevaluate ungulate population objectives in relation to carrying capacity.
- Monitor predator reductions with protocols having proper magnitude, duration and geographic extent to demonstrate clear outcomes.
- Implement new control programs only within an adaptive management framework and revise existing programs to incorporate adaptive management.
- Apply the National Research Council's recommended standards to existing programs when possible and to all proposed new programs.
- Provide additional funding to ensure that adequate data are available on key components of predator-prey-habitat interactions.

Finally, negative, long-term consequences of predator control may outweigh short-term increases in ungulate numbers. Such consequences include habitat damage from high ungulate populations that may result in population crashes of both ungulates and predators as well as the ancillary "costs" of predator control programs in terms of staff time and credibility with and support from the broader public. Many in the general public are concerned that the Alaska Board of Game process is not fair and representative of the broad public interest in Alaska's wildlife. We appreciate your support for fair and transparent government and ask you to encourage the Board of Game to consider the broader public interests in their wildlife decision making. Finally, we urge the State of Alaska to consider the ecological role that large predators play in preventing eruptions and crashes, and to consider conservation of predators on an equal basis with the goal of producing more ungulates for hunters.

Sincerely,

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