

January 6, 2005

Governor Frank Murkowski
State of Alaska
P.O. Box 110001
Juneau, Alaska 99811-0001

Dear Governor Murkowski:

As scientists and other wildlife professionals¹, we are submitting this letter to strengthen the application of science-based management to sound policy decisions for the wildlife and citizens of Alaska.

For many decades, predator control in Alaska has been advocated as a means to reduce wolf and bear predations to increase densities of ungulates available for hunter harvest. More recently, seven new predator control programs were approved by the Alaska Board of Game, covering tens of thousands of square miles in interior and southcentral Alaska. Additional programs will be considered at the upcoming Board of Game meeting this March in Anchorage.

Five of the seven programs are currently being implemented. Up to 580 wolves in 43,000 square miles are expected to be killed by aerial or same-day airborne hunting in winter 2004-2005.

These new programs depart substantially from the approaches used previously in that:

- six of the seven areas had no planning team,
- study plans were not prepared, and
- no allowance was made for weak or missing data.

Furthermore, predator control in one area was approved by the Board of Game against the advice of biologists of the Alaska Department of Fish and Game. These biologists indicated that they lacked key data necessary to justify the predator control program.

The Board of Game's recent approval of programs to reduce bear and wolf numbers to increase ungulate numbers is a step backward from earlier programs that incorporated most of the National Resource Council's major

¹ This letter represents 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.

recommendations for using biological standards and guidelines to monitor effectiveness of predator control programs. Consequently, the control programs as proposed will provide unexplainable or unclear results at best, wasted effort and failed response on the part of ungulate populations at worst.

Alaska's intensive management statute is a major barrier to implementation of the recommendations of the National Resource Council. Efforts to chase unattainable population and harvest objectives with poorly designed predator control programs may put at risk the long-term sustainability of ungulates, protection of habitat integrity, and the viability of predator populations.

Therefore, we strongly urge the state of Alaska to return to sound experimental design and monitoring so that results of any predator control programs can provide reliable data for policy and management decisions. Key standards that need to be employed include:

- Implementation of predator control only within an adaptive management framework,
- Monitor predator reductions with protocols having proper magnitude, duration, and geographic extent to demonstrate clear and obvious outcomes,
- Avoid implementing programs that have low probability of success,
- Avoid using artificially-inflated historical peaks for ungulate population levels as the management goals.

The track record of managing both eruptions and declines of key wildlife populations in Alaska is weak. Without appropriate safeguards to the design of predator control programs, we are concerned that the negative, long-term consequences may well outweigh any short-term increases in ungulate numbers that might be achieved.

Sincerely,

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