STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

DIVISION OF WILDLIFE CONSERVATION

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101/12/01

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Dr. Guy Cameron, President American Society of Mammalogists Department of Biological Scientists University of Cincinnati Cincinnati. OH 45221-0006

Dear Dr. Cameron:

Ron Somerville, a member of the Alaska Board of Game (BOG), shared your recent letter regarding prodator management in Alaska. I am responding to this letter because some of your points seem based on inaccurate information or assumptions.

The Alaska Department of Fish and Game (ADF&G) has done intensive research on predatorprey relationships in several areas of Alaska over the past 30 years. Nearly all of this information has been published in peer reviewed scientific journals. We are now using that knowledge to conduct predator management programs in five areas of Alaska designated in regulation by the BOG. These predator management programs, occurring on less than six percent of the state's total land mass, are based on solid science.

The Board of Game has not formulated the predator management programs over ADF&G's objections. The BOG makes informed decisions based on data and recommendations from department biologists, as well as information provided by 82 local Fish and Game Advisory Committees and any member of the public who wishes to express an opinion or provide information to the board. State laws require the BOG and ADF&G to develop aggressive management approaches in cases where important ungulate herds, an important food source for Alaskans, are failing to meet management objectives due to predation pressure.

Predator management in Alaska is an applied management program, not a research project. There are distinct differences between the two. It is not necessary, nor is it appropriate, to conduct intensive research in each area where we conduct a predator management program. In all disciplines, it is a commonly accepted practice to conduct research and then apply it to similar situations.

A detailed study plan is a vital part of any research project, but it is less relevant to a management program. Our management programs: (1) have defined goals; (2) use general methods to achieve objectives; and (3) measure results to evaluate whether goals have been

achieved. Each of the current predator management programs has an ADF&G-developed management plan that is incorporated into formal findings by the BOG in authorizing the removal of predators. Note that in each case, plans require that predators not be suppressed below defined levels, in order to maintain sustainable populations.

The National Research Council (NRC) report did not recommend we do an intensive research project before implementing each and every predator management program. Rather, the authors advocated an adaptive management process that would ensure the effects of predation control be evaluated. Our efforts to measure the effectiveness of these programs in a management context meet this objective.

We believe our predator management programs comply with the biological recommendations made by the NRC. Rather than accepting conclusions drawn from another's interpretation of the report, I invite you to draw your own conclusions by reviewing the recommendations of the NRC report as well as the BOG findings made for each predator control project implemented under the state's regulatory structure and public process. Upon review, I believe you will conclude that the State of Alaska's practices parallel the direction recommended in the NRC report.

It is desirable and important to incorporate information and lessons learned into our predator management programs, which is part of the adaptive approach that ADF&G and the BOG have taken. It also is important to measure the effects of the predator reduction programs that are implemented. However, as manager of wild resources over vast areas, ADF&G cannot make each project subject to intensive research standards. It simply does not make sense to do so.

It is one thing to employ science in shaping our management programs and quite another to postpone action in science's name by endlessly gathering data. ADF&G must fulfill its statutory obligation to manage the state's ungulate herds and to provide hunting opportunity; through intelligent use of information gathered already and that to be collected as part of our management programs, that is what we intend to do.

Sincerely,

Matt Robus
Director

cc:

Members, ASOM Board

Members, Alaska Board of Game Commissioner McKie Campbell