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ATTN: Board of Game Comments
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To Whom It May Concern:

Defenders of Wildlife, The Alaska Center for the Environment and The Alaska Wildlife Alliance appreciate the opportunity to submit these written comments on proposals that will be considered at the March, 26th – 30th, 2011 Board of Game (BOG) meeting in Anchorage, Alaska.

Established in 1947, Defenders of Wildlife (Defenders) is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focuses on the accelerating rate of species extinction and associated loss of biological diversity and habitat alteration and destruction. Defenders also advocates for new approaches to wildlife conservation that will help prevent species from becoming endangered. We have field offices around the country, including in Alaska where we work on issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears and impacts from climate change. Our Alaska program seeks to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while recognizing the role that predators play as indicator species for ecosystem health. Defenders represents more than 3,000 members and supporters in Alaska and more than one million nationwide.

The Alaska Center for the Environment (ACE) is a non-profit environmental education and advocacy organization, whose mission is to enhance Alaskans' quality of life by protecting wild places, fostering sustainable communities and promoting recreational opportunities. ACE advocates for sustainable policy on behalf of over 6,000 Alaskan members.

Founded in 1978, the Alaska Wildlife Alliance (AWA) is the only group in Alaska solely dedicated to the protection of Alaska's wildlife. Our mission is the

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protection of Alaska's natural wildlife for its intrinsic value as well as for the benefit of present and future generations. AWA is your voice for promoting an ecosystem approach to wildlife management that represents the non-consumptive values of wildlife. AWA was founded by Alaskans and depends on the grassroots support and activism of its members.

COMMENTS ON THE ALASKA BOARD OF GAME PROPOSALS

Proposal 130. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide an annual bag limit of 3 black bears in Unit 14C.

This proposal advocates raising the black bear bag limit - and potentially increasing the harvest - absent supporting data on changes in bear numbers or density. The sole justification is to provide more hunting opportunity; however, it has not been demonstrated that this bear population can support increased hunting. Bears in Unit 14C are affected by increasing loss of habitat and habitat encroachment by humans that exclude bears from areas where they previously thrived. Increasing harvest of such populations absent population data is not sound management.

Proposal 131. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the black bear bag limit to 3 with no closed season in the “remainder” of Unit 14C.

The justification for this proposal is that bears in Unit 14C are preying excessively on ungulates. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and sheep and increase the harvest of ungulates by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but there is no way of knowing absent valid field studies. We suggest that if the sponsor of this proposal suspects bear predation is limiting ungulate numbers in Unit 14C, they request the BOG to direct the Alaska Department of Fish and Game (ADF&G) to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors.

Proposal 132. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the harvest objective for black and brown bears in the Anchorage Bowl, Unit 14C.

The justification for this proposal is that bears in the Anchorage Bowl are too tolerant of humans and this creates a public safety risk that could be reduced by hunting bears more intensively.

The proponent of this proposal provides no data to support the claim that increased hunting of bears would reduce the tolerance of bears for people and reduce the risk of bears injuring humans. While we share concern over public safety and human wildlife conflict, there is no evidence that conflict is increasing – on the contrary, increased public education of bear safety practices has measurably reduced conflict in recent years.

We therefore support the continued efforts of ADF&G staff and the Anchorage Bear Committee to educate the public about how to reduce attractants including proper food and trash storage and the efforts by ADF&G to close trails near salmon streams during spawning season to avoid bear-human conflicts. Bear-human conflicts should be handled on a case-by-case basis as has successfully been done in recent years. Broad-scale efforts to increase hunting are unacceptable in an urban environment.

Increased hunting in areas within the city limits of Anchorage and in Chugach State Park is incompatible with other uses, raises public safety concerns and is opposed by many residents.

Proposal 140. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the bag limit of wolves to 2 per day with no closed season in all of Unit 14C.

The justification for this proposal is that wolves in the Anchorage Bowl are too tolerant of humans and this creates a public safety risk that could be reduced by hunting wolves more intensively.

Despite these claims, there are no data available indicating that increased hunting would decrease the number of wolves in the Anchorage Bowl and therefore decrease risks to humans. Nor are there data indicating that increased hunting of wolves would reduce the tolerance of wolves for people and thus reduce the risk of wolves injuring humans.

Increased hunting in areas within the city limits of Anchorage and in Chugach State Park is incompatible with other uses and is opposed by many residents. Wolf-human conflicts should be handled on a case-by-case basis as has successfully been done in recent years. Broad-scale efforts to increase hunting are unacceptable in an urban environment.

We suggest that expanded public education efforts teaching proper human behavior in the presence of wolves and proper handling of dogs when traveling or living in wolf country is a better and more cost effective alternative than broad-scale efforts to increase hunting near the city. Research has shown that a strong majority of Anchorage residents take pride in the city's wildlife and feel that people should be willing to accept some conflict if they want to live here.¹

Proposal 150. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow a hunter to take five black bears every year in Units 7 and 15.

The listed justification for this proposal is that black bears are preying excessively on moose on the Kenai Peninsula. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but this cannot be determined absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose for hunters. Proposals like this are typical of the "war on predators" that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result.

¹ Alaska Department of Fish and Game. 1999. Living with Wildlife in Anchorage: A Cooperative Planning Effort. Chapter 4: Wildlife in Anchorage
<http://www.adfg.alaska.gov/index.cfm?adfg=anchorageplanning.anchorage5#values>

Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality to moose on the peninsula they should consider such sources and ask that the BOG direct the ADF&G work with the DOT (DOT) to decrease road mortality of moose.

Proposal 151. We *oppose* this proposal and urge the BOG to reject it.

This proposal if adopted would allow a hunter to take 3 black bears every year in Units 7 and 15.

The listed justification for this proposal is that there is an increasing number of bears in Units 7 and 15 and bears are preying excessively on moose. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose for hunters. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 7 and 15, it should request the BOG to direct the Department to undertake field studies to evaluate the nature and extent of bear

predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 152. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the number of hunting tags for brown bears in Unit 15.

The justification for this proposal is that there are too many brown bears in Unit 15C and that increasing the number of tags issued would result in more bears being taken and a reduced risk of human injuries due to bears.

We support the continued application of bear harvest quotas as provided by the cooperative joint state-federal Kenai Peninsula Brown Bear Management Plan, and oppose measures to change the plan's harvest guidelines which have been applied successfully in recent years.

Proposal 153. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide for an annual harvest objective of 100 brown bears in Unit 15C.

The listed justification for this proposal is that there is a high number of brown bears in Unit 15C and bears are preying excessively on moose. Increasing the harvest objective is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Unit 15C, nor is there any reason to believe that reducing predators will result in more moose for hunters. Further, the most recent (2001) population estimate for the Kenai brown bears is 250-300 animals. Based on this estimate, a

harvest objective of 100 bears per year would result in a 30-40% harvest rate – which far exceeds the 6% sustainable human mortality rate for brown bears.

Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 15C, they should request the BOG to direct the Department to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 154. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the brown bear harvest quota in Unit 15.

The suggested justification for this proposal is that brown bears in Unit 15 are preying excessively on moose. Increasing the harvest quota is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

We support the continued application of bear harvest quotas as provided by the cooperative joint state-federal Kenai Peninsula Brown Bear Management Plan, and oppose measures to change the plan’s harvest guidelines which have been applied successfully in recent years.

We suggest that if the sponsor of this proposal suspects brown bear predation is limiting moose numbers in Unit 15, he should request the BOG to direct the Department to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 155. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide an unlimited bag limit with no closed season on coyotes in Units 7 and 15.

The justification for this proposal states that coyote predation on newborn moose calves is high. No studies anywhere in Alaska have ever documented that coyote predation on moose calves is sufficient to limit moose numbers or to affect human harvests of moose.

This proposal and several others like it raise the issue of *de facto* predator control. While coyotes are targeted in this proposal much *de facto* control, including lengthening seasons and raising bag limits, has been directed at wolves. We have commented extensively on these types of control measures which are designed to reduce predators over much of Alaska. These incremental measures are not part of a scientifically-sound formal predator control program and virtually always lack field study data indicating that the target predator population in the affected areas strongly limit ungulate numbers. Nor do these measures require the public review that the formal predator control program would need to be implemented. Therefore, we urge the BOG to reject proposals for *de facto* predator control on all target species, including wolves, bears and coyotes.

Proposal 163. We *support* this proposal and urge the BOG to adopt it.

This proposal, if adopted, would lower the intensive management moose population and harvest objectives in Unit 15A.

When the BOG initially set intensive management population objectives for many ungulate populations across Alaska it often relied on past population estimates from times when these populations reached historically high numbers. In some cases, the historic estimates were little more than guesses, often much higher than the likely number of animals actually present. Clearly, for many ungulate populations that reached peaks in the 1950s or 1960s, census methods were crude and not based on statistical analyses. Furthermore, in most cases, the population

peaks were followed by crashes demonstrating that peak numbers were unsustainable.

Accordingly, we strongly endorse the concept of periodically re-visiting intensive management population objectives, adjusting them as necessary to provide objectives that are attainable and sustainable and incorporate the best available data on the capacity of the habitat to sustain the objective population sizes if they are met. Failure to do so creates unrealistic expectations among hunters and sets the stage for perpetual predator control to meet prey population objectives that are unlikely to ever be achieved.

We are encouraged to see that the ADF&G has provided an excellent analysis of the situation in Unit 15A and has recommended lowering the intensive management population objective for moose in light of the changes in habitat quality and the ever-increasing encroachment into moose habitat by humans on the northern Kenai Peninsula. We strongly urge the BOG to adopt this proposal and to encourage the ADF&G to re-examine intensive management population objectives in other units where initial efforts to set objectives resulted in grossly inflated numbers.

Proposal 169. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would change several of the moose hunting regulations in Units 7 and 15 and provide for an increased take of wolves and bears.

The suggested justification for this proposal is that wolves and bears in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose for hunters. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized

in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 172. We *oppose* this proposal and urge the BOG to reject it.

This proposal if adopted would allow aerial shooting of wolves in Unit 15.

The listed justification for this proposal is that wolves in Unit 15 are preying excessively on moose. According to the proposal, allowing aerial shooting would increase the harvest of wolves which is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on valid field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, severe winters and bear predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

We also note that Unit 15 is poorly suited to aerial shooting of wolves due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Allowing aerial shooting would likely be ineffective in lowering wolf numbers in this unit. Further, as the Kenai is heavily visited by a variety of recreational user groups, allowing aerial shooting of wolves would create a human safety risk and would likely result in increased conflict between user groups.

Finally, the majority of land on the Kenai Peninsula is managed by the U.S. Fish and Wildlife Service (FWS) as the Kenai National Wildlife Refuge. Alaska's intensive management programs are inconsistent with FWS policy and mandates. Thus the majority of the Kenai would be exempted from aerial control programs, decreasing any potential benefit.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Unit 15, they should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 173. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would change certain moose hunting regulations in Unit 15A and would aim to reduce black bears and wolves as part of an intensive management program designed to increase moose numbers for hunters.

The listed justification for this proposal is that wolves and bears in Unit 15A are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

We also note that the proposal recommends allowing same-day airborne and aerial shooting of wolves in Unit 15A. This unit is poorly suited to aerial shooting of wolves due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Allowing aerial shooting would likely be ineffective in lowering wolf numbers in this unit. Further, as the Kenai is heavily visited by a variety of recreational user groups, allowing aerial shooting of wolves would create a human safety risk and would likely result in increased conflict between user groups. Finally, the majority of land on the Kenai Peninsula is managed by the U.S. Fish and Wildlife Service (FWS) as the Kenai National Wildlife Refuge. Alaska's intensive management programs are inconsistent with FWS policy and mandates. Thus the majority of the Kenai would be exempted from aerial control programs thus decreasing any potential benefit.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Unit 15A, they should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to

other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 174. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would establish a habitat-based intensive management program in Unit 15A to increase moose numbers to benefit hunters.

The proposal outlines the history of the moose population from 1947 when a large wildfire created vast areas of high-quality moose habitat and moose numbers increased greatly. By the early 1970s, forest succession greatly reduced habitat quality and moose declined sharply following a series of severe winters. From 1991 to 2008, further declines reduced the moose population from 2,931 to 1,670 animals. The intensive management population objective is 3,000-3,500, but we note that Proposal 163, if adopted, would lower this to 1,960 to 2,600.

During the late 1970s and early 1980s, a moose habitat enhancement program was conducted by state and federal agencies in this area. Large areas of black spruce forest (re-growth from the 1947 burn) were treated by crushing trees using large machines. This ended when federal management guidelines discouraged single-species management on National Wildlife Refuge lands.

Now, a state sponsored intensive management program is proposed to increase moose in Unit 15A by enhancing habitat, but details outlining where and how this would be done are absent. Reference is made to controlled burns (and the resulting smoke problems) but no specifics are provided. We note that past efforts at controlled burning in this area by both the U.S. Forest Service and the FWS were generally not effective due to unsuitable weather conditions or failure of burned areas to regenerate to high-quality moose habitat.

We also note that areas along Alaska's road system where moose populations are at high density experience a high frequency of moose-vehicle accidents with accompanying property damage, injuries and loss of life. This is the case in Fairbanks where state troopers can no longer handle the large number of road-killed moose carcasses available for charity. The Kenai Peninsula already has about 225 road-killed moose per year. Is it wise to increase moose numbers and risk additional road kills? We suggest that the BOG should direct the ADF&G to work with the DOT to devise innovative ways to minimize road kills.

Lacking specifics concerning the methods, extent, and land ownership mosaic affected by the proposed program, we cannot endorse this proposal despite the

encouraging fact that predator control for this intensive management program is not proposed at this time. We also generally cannot endorse intensive management programs on National Wildlife Refuge lands where ecosystem values, as opposed to single-species management (or management of one species at the expense of another), is the main focus.

Proposal 175. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow use of artificial lights at night to shoot black bears, wolves and coyotes in Units 7 and 15.

The listed justification for this proposal is that wolves, coyotes and black bears in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

Allowing night hunting of black bears would set a dangerous precedent, potentially harmful to both hunters who might try to follow wounded bears in the dark and to others in the area who might encounter wounded bears. Night hunting of bears presents serious safety problems that should be avoided.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 176. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow use of artificial lights at night to shoot wolves and coyotes in Units 7 and 15.

The listed justification for this proposal is that wolves and coyotes in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose for hunters. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 186. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow same-day airborne hunting of black bears at bait stations in all units of Region 2.

Prohibition of same-day airborne hunting of big game animals in Alaska has been in effect for decades with certain exceptions. In recent years, exceptions have been made for hunting bears in predator control areas as a means of severely reducing bear numbers in an attempt to increase ungulates for hunters.

Individuals and fish and game advisory committees noted these exceptions and now wish to extend them over vast areas not part of predator control programs. We

urge the BOG to reject proposals like this and attempt to inform the public that fair chase standards (including prohibition of same-day airborne hunting) are still important and should be preserved.

Proposal 187. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would establish an annual trapping bag limit of 10 black bears for all units of Region 2.

We opposed the re-classification of black bears establishing them as furbearers. The re-classification was adopted to allow foot snaring of black bears in predator control areas. Now, proposals like this want to allow “trapping” over vast areas not part of control programs through the use of guns, bows and arrows, muzzle loaders, or spears in addition to foot snares.

We especially oppose the proposed bag limit of 10 bears. This is excessive and may result in over-harvesting bears locally.

Proposal 189. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would provide for no closed season and no bag limit for coyotes in all units of Region 2.

The justification for this proposal is that coyotes are preying excessively on marten, red fox, lynx and sheep and that having unlimited hunting of coyotes would relieve this predation pressure.

No studies anywhere in Alaska have ever documented that coyote predation on marten or lynx is sufficient to limit numbers of these predators or to affect human harvests of them.

This proposal and several others like it raise the issue of *de facto* predator control. While coyotes are targeted in this proposal much *de facto* control, including lengthening seasons and raising bag limits, has been directed at wolves. We have commented extensively on these types of control measures which are designed to reduce predators over much of Alaska. These incremental measures are not part of a scientifically-sound formal predator control program and virtually always lack field study data indicating that the targeted predator population in the affected areas strongly limit ungulate numbers. Nor do these measures require the public review that the formal predator control program would need to be implemented. Therefore, we urge the BOG to reject proposals for *de facto* predator control on all target species, including wolves, bears and coyotes.

Proposal 197. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would allow same-day airborne hunting of black bears at bait stations in all units of Regions 2 and 4.

Prohibition of same-day airborne hunting of big game animals in Alaska has been in effect for decades with certain exceptions. In recent years, exceptions have been made for hunting bears in predator control areas as a means of severely reducing bear numbers in an attempt to increase ungulates for hunters.

Individuals and fish and game advisory committees noted these exceptions and now wish to extend them over vast areas not part of predator control programs. We urge the BOG to reject proposals like this in an attempt to inform the public that fair chase standards (including prohibition of same-day airborne hunting) are still important and should be preserved.

Proposal 224. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the bag limit of black bears in Units 7 and 15 to three annually with no closed season.

The listed justification for this proposal is that there is an increasing number of bears in Units 7 and 15 and bears are preying excessively on moose. Increasing the bag limit is projected to increase the bear harvest, decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides bear predation such as poor habitat, heavy hunting and poaching, severe winters and wolf predation, all of which have been shown to contribute to limiting ungulate populations in other areas. Bear predation may or may not be an important limiting factor, but there is no way of knowing absent field studies.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose for hunters. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 7 and 15 he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of bear predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 226. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would increase the bag limit for wolves to 10 per day and allow snowmachine pursuit of wolves in Units 7 and 15.

The listed justification for this proposal is that wolves in Units 7 and 15 are preying excessively on moose. Increasing the harvest of predators is projected to decrease predation on moose and increase the harvest of moose by hunters.

There is no evidence or data presented to substantiate any of these claims. Predator control programs must be based on field data identifying limiting factors for ungulate populations that include other variables besides predation such as poor habitat, heavy hunting and poaching, and severe winters, all of which have been shown to contribute to limiting ungulate populations in other areas. Predation may or may not be an important limiting factor too, but there is no way of knowing absent field studies. We suggest that if the sponsor of this proposal suspects predation is limiting moose numbers in Units 7 and 15, that he should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of predation in relation to other limiting factors.

There is no recent biological information indicating excessively heavy predation on moose in Units 7 and 15, nor is there any reason to believe that reducing predators will result in more moose for hunters. Proposals like this are typical of the “war on predators” that is being waged in Alaska where hunting interests believe that predator reduction by whatever means is necessary to maintain huntable numbers of ungulates. Seasons and bag limits on predators have been excessively liberalized in many areas but there is no evidence that moose hunters benefited as a result. Until field studies confirm that predation is limiting moose on the Kenai Peninsula, the BOG should not attempt to further reduce predator numbers.

We suggest that if the sponsor of this proposal suspects bear predation is limiting moose numbers in Unit 7 and 15, that it should request the BOG to direct the ADF&G to undertake field studies to evaluate the nature and extent of bear

predation in relation to other limiting factors. Moose on the Kenai Peninsula in particular are subject to heavy road mortality; 225 have been killed annually on the Sterling Highway in the last decade – mostly females and calves. If the proponent is concerned about excessive mortality they should consider such sources and also ask that the BOG direct the ADF&G work with the DOT to decrease road mortality of moose.

Proposal 230. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if adopted, would change the regulations requiring guides to accompany hunters at black bear bait stations.

We endorse the present regulations requiring guides to accompany hunters at bear baiting stations.

Conclusion

We recognize that not all individuals who submit comments and proposals are wildlife professionals. However, it is our opinion that proposals submitted to the BOG often lack necessary scientific justification to support their passage. Unfortunately the majority of proposals in the March, 2011 proposal book focus narrowly on suppressing predation, failing to consider other factors that lead to low – or perceived low – moose or caribou population density: weather, displacement due to disturbance, over-harvest, excessive road mortality, lack of adequate habitat, and other factors.

Further, proposals aimed at allowing what we deem *de facto* predator control attempt to circumvent the formal process through which predator control programs are publicly reviewed, adopted and implemented. We urge the BOG to reject proposals that aim to reduce predation absent biological justification; predator control programs should only be adopted through the formal predator control implementation planning process.

We continue to maintain that the State of Alaska has failed to scientifically justify their predator control programs, which are driven more by politics than science. Independent scientists and wildlife experts both in Alaska and across the nation have criticized the single species wildlife management strategies employed by the state. We continue to urge those charged with the responsible and sustainable management of our wildlife resources – including predators – to develop a comprehensive, scientifically justifiable and socially acceptable predator control program based on the 1997 National Research Council Review.

Thank you for considering our comments.

Sincerely,

Theresa Fiorino
Alaska Representative
Defenders of Wildlife

On Behalf of:

Valerie Connor
Conservation Director
Alaska Center for the Environment

John Toppenberg
Executive Director
Alaska Wildlife Alliance