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ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
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To Whom It May Concern:

The Alaska Center for the Environment, The Alaska Wildlife Alliance, and Defenders of Wildlife appreciate the opportunity to submit these written comments on proposals that will be considered at the November 5-9, 2010 meeting in Ketchikan, Alaska.

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 nearly 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 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.

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.

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COMMENTS ON THE ALASKA BOARD OF GAME PROPOSALS

Proposal 8 – 5 AAC 84.270 Furbearer trapping.

We **oppose** this proposal. The proposal aims to lengthen the wolverine trapping season by 2.5 months in Game Management Unit (GMU) 1A in order to align wolverine trapping with wolf trapping and facilitate the taking of more wolves.

The proponent states that the Alaska Department of Fish and Game (ADF&G) data fails to justify the short season and claims that wolf trapping effort has dropped in the later part of the wolf season because of the short wolverine season; however, the proponent fails to provide evidence to support this claim. According to ADF&G's 2007 furbearer management report, wolverines are not generally targets for trappers in this region but are taken incidentally to wolf or marten trapping. Therefore, increasing the wolverine harvest season would be expected to have little if any effect on wolf trapping in this GMU.

The ADF&G report also states that little is known about southern southeast wolverine populations or abundance. Adoption of regulations that could potentially result in the increased take of a species about which so little is known is not wise management of a valuable resource.

The proponent states that the proposal would improve deer and goat populations; however, there is no evidence that increasing the take of wolves would be beneficial for deer or goat numbers or increase hunter success in GMU 1A, nor is there evidence that predation is limiting these populations. The rationale for having excessively long seasons in order to benefit prey populations is therefore invalid. Accordingly, we find that there is no rationale for wolf control in GMU 1A and extending the trapping seasons in order to provide de facto wolf control is not justified.

Proposal 9 – 5AAC 84.270 Furbearer trapping; and 85.056 Hunting seasons and bag limits for wolf.

We **oppose** this proposal. The proposal aims to increase the management objective in GMU 1A from 25 to 30 wolves per year stating that the harvest levels have averaged 30.5 wolves annually over the last 24 years; thus, according to the proponent, exceeding the harvest objectives. However, the proponent fails to provide any evidence to support the claim that “thirty wolves is a realistic number.” Despite the fact that an average of 30.5 animals have been harvested from GMU 1A, the year to year harvest

has varied dramatically. As population estimates do not exist for this population there is no basis for increasing the management objective.

Proposal 15/ Proposal 38 – 5AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.

We **support** the adoption of either of these proposals as the resulting regulation would be the same. The proposals call for requiring GPS coordinates for baiting black bears in GMU 1D. Baiting stations should be marked in the interest of public safety and to assist with enforcement of frequently violated bear baiting regulations.

Proposal 18 – Furbearer trapping; and 5 AAC 92.170. Sealing of marten, lynx, beaver, otter, wolf, and wolverine.

We **support** this proposal. This proposal would modify wolf trapping regulations by implementing an annual bag limit of 10 wolves and require sealing of wolf pelts within 14 days of harvest.

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf that is genetically distinct from interior Alaskan wolf populations and lives in geographically and genetically isolated island populations in Southeast Alaska. Due to changing forest habitats in Southeast, concern over the continued long-term viability of this genetically distinct wolf population continues to grow. ADF&G as well as numerous conservation organizations have expressed their concern over the long-term viability of this subspecies.

ADF&G states that the reported harvest of this population has decreased dramatically in recent years and biologists working in the field in GMU 2 have seen little wolf sign this year. Both factors indicate a possible population decline.

As ADF&G states in the proposal, reducing the bag limit to 10 wolves/year will spread opportunity between trappers, while requiring sealing within 14 days will allow managers to more quickly determine when the harvest cap has been reached. Adoption of this proposal combined with a lower harvest cap will assist in stabilizing the wolf population in this GMU and reduce the potential for listing under the Endangered Species Act.

Proposal 25 – 5 AAC 84.270. Trapping seasons and bag limits for wolves; 85.056. Hunting seasons and bag limits for wolves; and 92.051. Discretionary trapping permit conditions and procedures.

We **support** the intent behind this proposal, however the objectives would be met by the passage of **Proposal 18**, which we support. This proposal urged, the Board of Game (BOG) to utilize the best available biological and social information to determine the best course of action and to consider implementing multiple regulatory changes. ADF&G has analyzed the issue and has determined that the best course of action would be what is proposed in **Proposal 18**.

In addition to passing **Proposal 18**, we appreciate that ADF&G will work closely with the US Forest Service to pass stricter federal regulations for marking traps and we encourage the BOG to work with the Department of Public Safety to ensure current regulations are enforced.

Proposal 27 – 5AAC 85.056. Hunting seasons and bag limits for wolf

We **oppose** this proposal. The proposal seeks to extend the season to May 31st from its current closure of April 30th.

The proponent of this proposal states that deer populations are suppressed in this area due to three winters of record snowfall and a record high population of wolves. However, as the proponent states “three consecutive winters of record snowfall” are largely responsible for the “depressed” deer populations in GMU 3. The proponent provides no evidence to support the claim that populations of wolves are at a record high.

Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will likely continue to impact wildlife species. Biologists expect to see a decline in deer populations throughout the region due to changes in forest habitat quantity and quality. Wolf hunting seasons in GMU 3 already extend late into the spring (April 30) when females are pregnant and dens are being established; shooting them during this time is inhumane and not sound management for a subspecies of conservation concern or one with big game and furbearer values. Hides in late April are already often badly rubbed and have much reduced value on the fur market. They make poor quality trophies for recreational hunters. Fur quality further deteriorates by the end of May greatly decreasing its value.

There is no evidence that closing wolf hunting seasons later would be beneficial for deer numbers or hunter success in GMU 3, nor is there evidence that predation is

limiting these populations. The rationale for having excessively long seasons in order to benefit prey populations is therefore invalid. Accordingly, we find that there is no rationale for wolf control in GMU 3 and extending the hunting seasons in order to provide de facto wolf control is not justified.

Proposal 28 – 5 AAC 92.410. Taking game in defense of life or property (DLP)

We **oppose** this proposal. The proponent of this proposal argues that the ADF&G should eliminate consideration of animals taken in DLP in GMU 4 when setting harvest caps for brown bears – stating that “DLP brown bear kills...as a result of poor garbage management has little or nothing to do with wildlife management related to sport hunting.” Unfortunately, this proposal fails to consider the impact that DLP kills have on the regional brown bear population.

When setting harvest objectives or caps the ADF&G must consider all sources of mortality in order to prevent over-exploitation. If – as the proponent states – DLP kills are increasing, the ADF&G must pay more, not less, attention to the potential for over-harvest. Lack of consideration of DLP kills would represent a failure by ADF&G to sustainably manage brown bear populations.

If the proponent is concerned that brown bear hunting opportunities are decreasing as a result of poor waste management, we urge them to be more proactive in improving management of waste in order to prevent DLP kills rather than advocate for regulations which could lead to over-exploitation of the brown bear population.

Proposal 35 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.

We **support** this proposal. This proposal seeks to reduce resident black bear bag limit from 2 bears to 1 bear in GMUs 1-3 and 5; the proposal would work in conjunction with **Proposal 36** to ameliorate concern over potentially declining bear populations in these GMUs.

Black bears in Southeast Alaska live in isolated island populations and their continued viability is necessary to promote ecological health of the forest system. Further, black bear hunting is an economic driver in the region and thus any population decline is of great consequence to the local economy. In order to insure the continued viability of the population, it is clear that black bear harvests must continue to be tightly regulated in order to prevent over-exploitation.

ADF&G has expressed concern over the potential over-harvest of black bears in these GMUs. While we would have liked to have seen a harvest cap implemented –

especially for GMU 2 where considerable concern exists over the over-harvest of females and declining skull size of harvested animals – such a proposal was not introduced as a management option and we trust that ADF&G’s solution will be sufficient. However, we urge the ADF&G to closely monitor the results of this regulatory change and consider further steps, such as implementing harvest caps, should these populations continue to show signs of decline.

Proposal 36 – 5AAC 85.015. Hunting seasons and bag limits for black bear.

We **support** the adoption of one of the proposed changes in order to regulate the harvest of black bears and prevent over-exploitation in GMUs 1-3, and 5. The implementation of one of these harvest regulations would work in concert with regulations proposed in **Proposal 35** to prevent over-harvest of black bears.

While ADF&G states that the implementation of a draw hunt for non-residents is their preferred alternative, we would also like to see bear baiting closed in these GMUs. Baiting bears is a highly contentious issue and often considered a method of ensuring adequate harvest of bears in areas where they are deemed significant predators of ungulates. However, ensuring adequate harvest of a population of black bears in a region where conservation concern exists is neither necessary nor responsible. Further, shooting of bears over bait is not considered fair chase.

Proposal 37 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.

We **oppose** this proposal. The proposal seeks to decrease the harvest of black bears by implementing a drawing permit program for **unguided, nonresident** hunters (emphasis added). The proposal does not go far enough to limit the harvest of black bears in these GMUs. Proposals 35 and 36 more adequately meet this objective.

Proposal 39 – 5 AAC 92.044 (12). Permit for hunting black bear with the use of bait or scent lures.

We **support** this proposal. The proposal seeks to eliminate bear baiting in GMUs 1, 2, and 3. Baiting bears is a highly contentious issue and often considered a method of ensuring adequate harvest of bears in areas where they are deemed significant predators of ungulates. However, ensuring adequate harvest of a population of black bears in a

region where conservation concern exists is neither necessary nor responsible. Further, shooting of bears over bait is not considered fair chase.

Proposal 43 – 5AAC 85.056. Hunting seasons and bag limits for wolf.

We **support** this proposal. This proposal aims to modify the wolf hunting season in GMUs 1, 3, 4 and 5 to open on September 1st and close on March 31st. Wolf hunting seasons in GMUs 1, 3, 4, and 5 now open on August 1st and close on April 30.

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf that is genetically distinct from interior Alaskan wolves. These populations are endemic to Southeast, isolated from the mainland, and isolated from each other by large bodies of water. Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will continue to impact all wildlife species in this region. The issue of forest management and long term carrying capacity of forest habitat need to be considered when making wildlife management decisions and regulations for Southeast Alaska

In late April, female wolves are pregnant and nearly at full term. On August 1st wolf pups are only about half grown and are totally dependent on adults for food and protection from predators including bears. Shooting them during these time periods is inhumane and not sound management for a subspecies of conservation concern, or one with big game and furbearer values. Hides in late April are often badly rubbed and have much reduced value on the fur market. In August, wolf hides are nearly worthless and make very poor trophies for recreational hunters.

In their 2005 Wolf Management Report, the ADF&G stated that most wolf hunting and trapping that occurs in Southeast is recreational and viewed by many as simply a means of controlling wolf populations to improve deer and moose populations. While wolf hunting seasons such as those currently in effect might be justified if de facto wolf control was necessary and the regulations accomplished the goal of reducing wolf numbers and increasing prey, there is no evidence that any of these conditions apply. The BOG has issued no written findings indicating deer populations in southeast Alaska currently require predator control to increase deer numbers – in fact the bag limit for deer in GMUs 1, 3, and 4 is at least 2 and up to 4 animals in GMUs 1, 3, and 4 and all GMUs remain open to non-resident hunters. Accordingly, we find that there is no rationale for de facto wolf control in Southeast Alaska and the excessively long hunting seasons designed to provide de facto wolf control are not justified.

In the fall of 2002 the BOG voted to close hunting in the months of August and April due to concerns over early and late season pelt quality and harvesting during denning. However, this decision was rescinded in the fall of 2004. We believe this decision was

an oversight as the concerns that led the BOG to shorten the hunting season in 2002 still apply.

Thank you for considering our comments.

Sincerely,

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