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**DEFENDERS OF WILDLIFE'S COMMENTS ON THE PROPOSALS
TO BE CONSIDERED AT THE FEBRUARY 29 - MARCH 10, 2008
BOARD OF GAME MEETING IN FAIRBANKS, ALASKA**

February 15, 2008

Via Facsimile: 907-465-6094

Mr. Cliff Judkins, Chairman, Board of Game
Ms. Kristy Tibbles, Executive Director, Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Judkins and Ms. Tibbles:

Defenders of Wildlife ("Defenders") appreciates the opportunity to submit these written comments on proposals that will be considered at the February 29 - March 10, 2008 meeting in Fairbanks, Alaska.

Established in 1947, 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 programs seek to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. Defenders represents more than 5,800 members, activists and subscribers in Alaska and more than one million nationwide.

Our comments follow. Also, see the attached appendix with 64 individual comments from our members and supporters:

Proposal # 3 – Amend hunting season for black bear in Unit 16 and Wolverine Creek in Unit 16B – Proposed by Board of Game to reduce wildlife viewing conflict – **Support**. Defenders supports this proposal because the original purpose of the viewing area restrictions contemplated all bears, not just brown bears and therefore this proposal will provide the intended protections for black bears.

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Proposal # 8 – Allow black bear trapping in Unit 19 – **Oppose**. Defenders opposes the trapping of bears for the following reasons. Trapping of bears is not allowed anywhere in Alaska, nor does any other western state permit this practice. Bears have never been classed as furbearers under Alaska law. We object to creating a new class of trappable animals. Nuisance bears can already be taken under existing defense of life and property laws. We also object to trapping bears on the grounds of humaneness. Catching and holding large, powerful and potentially dangerous animals in snares and leg-hold traps presents a situation where wounding, loss and injury can occur. Injured bears can escape resulting in prolonged suffering. With no “time-check” requirements, bears that are held in traps suffer by struggling more than other furbearers do. Wounded bears that are likely to escape from traps and snares are serious threats to public safety because they cannot feed normally and are traumatized by the pain that constricted snares cause.

Proposal # 9 – Lengthen brown bear hunting season in Unit 19B and 19C three weeks, from September 1 to August 10 – **Oppose**. As stated by the proponent, this is a predator control proposal. Without a specific plan established by the Board for a bear predation control area, supported by adequate data, there is no basis for adopting such a proposal.

Proposal # 16 – Extend wolverine hunting season in Unit 19 six weeks, from March 31 to May 15 – **Oppose**. None of the interior GMU’s have had wolverine trapping seasons this late in the past. Poor pelt quality results in the waste of a resource.

Proposal # 18 – Shorten the lynx season by one month in Unit 20F, from November 1 to February 28, to December 1 to February 28 – **Support**. Greg Gau, the proposal writer, states that trappers are the ones likely to benefit from this change. As Mr. Gau says, “Lynx don’t get prime until December; why send unprimed fur to the fur auctions?”

Proposal # 42 – Establish a grizzly bear baiting season in Unit 20B – **Oppose**. We oppose bear hunting using bait, as it has the potential to habituate animals to human foods, may inadvertently boost populations of the target animals by giving them supplemental food, and violates the principle of fair chase. We maintain that hunters and trappers with stealth and weapons have the tools they need to harvest bears without the use of artificial bait stations.

Proposal # 43 – Prohibit big game hunting in parts of Unit 20 a certain amount of time after gaining access by an airboat – **Support**. This proposal helps prevent overharvest, herding, and harassment of game.

Proposal # 44 – Prohibit big game hunting in parts of Unit 20 a certain time after gaining access by an off-road vehicle – **Support**. This proposal supports ethical hunting practices (reducing “running and gunning”) and will reduce problems with habitat degradation caused by indiscriminate off-road vehicle use.

Proposal # 46 – Increase bag limit of brown bear in Units 21A and 21D to two bears per year – **Oppose**. This is a predator control proposal as stated by the proponent, without any supporting information. Without a specific plan established by the Board for a bear predation control area, supported by adequate data, there is no basis for adopting such a proposal.

Proposal # 52 – Increase Unit 21A hunting bag limit of wolves to 10 per day, and extend the season to August 10-May 31 – **Oppose**. Two national wildlife refuges are within the boundaries of Unit 21A. Raising the bag limit to 10 per day will encourage waste of a valuable resource. Extending the hunting season to May 31 will mean that wolves are being hunted when the fur is no longer prime, and at the height of the pupping and denning period. This time period is typically avoided for reasons of ethics and in order not to waste a valuable resource.

Proposal # 56 – Increase the bag limit on black bears to five every regulatory year in Units 21A and 21E – **Oppose**. A bag limit of five is excessive in Units 21A and 21E, which contain portions of three national wildlife refuges. Bears are relatively slow to reproduce, and should be managed conservatively.

Proposal # 61 – Establish an archery season for wolves in the Dalton Highway Corridor Management Area from August 10-May 31, or May 1-31 – **Oppose**. This is the pupping season for wolves. Orphaning pups by shooting adult pack members is unethical and publicly unacceptable.

Proposal # 68 – Allow taking black bears by denning or other traditional methods in Unit 25D – **Oppose**. Unit 25D is mainly composed of the Yukon Flats National Wildlife Refuge. We are concerned that, while the proponent claims that “traditional methods helped manage the bear population in the past,” it would not be just Native Alaskans that would be allowed to conduct this practice. Further, we believe that there is little justification and virtually no public support for actions such as killing bears in their dens. Denning leads to a waste of a valuable resource. Hunting techniques may be used if one wishes to participate in a reduction of predators.

Proposal # 74 – Reduce the November bag limit in Unit 12 and Unit 20E to one lynx – **Support**. This proposal, from the Upper Tanana/Fortymile Advisory Committee, seeks to reduce the excessive trapping of lynx which is occurring under current management. “During recent years a few unethical trappers have begun to abuse the November season ... by specifically setting numerous traps along the highway corridors, intended to catch lynx ... and then reporting those lynx in December to circumvent the five lynx bag limit.”

Proposal # 75 – Allow black bear trapping in Units 21 and 24 – **Oppose**. Bear trapping is not allowed anywhere under current State regulations. Considerations for trapping ethics and human safety indicate that bear trapping should not occur anywhere in Alaska except for specific management purposes conducted by professionals (live capture and relocation, for example). See our comments on Proposal 8 for additional rationale.

Proposal # 79 – Allow the taking of black bears in Units 21 and 24 using artificial light – **Oppose**. The practice of denning has been outlawed for many years. Destroying the young in a nest is widely condemned as an unethical style of hunting. Harvesting bears in this manner jeopardizes sustained yield and risks overharvest of a valuable resource. Spotlighting or using artificial light to search for prey has long been widely prohibited for reasons of hunter ethics, fair chase, avoiding excessive harvest, and law enforcement issues.

Proposal # 83 – Allow the use of bait or scent lures in Region III units while floating rivers, creeks or lakes – **Oppose**. We oppose bear hunting using bait, as it has the potential to habituate animals to human foods, may inadvertently boost populations of the target animals by giving them supplemental food, and violates the principle of fair chase. We maintain that hunters and trappers with stealth and weapons have the tools they need to harvest bears without the use of artificial bait stations.

Proposal # 86 – Establish a wildlife refuge in the Tangle Lakes Unit 13 area, disallowing hard-rock mining, in order to protect habitat and cultural features – **Support**. According to the proponent, the Cooper Country Alliance, “Large-scale hard-rock mining, and some mineral exploration practices, can harm wildlife habitats and wildlife The continuing long-term value of renewable resources in the eastern Denali Highway area exceeds the short-term non-renewable value of any minerals that might be extracted.... This proposal address hard rock mining, not the small-scale placer mining that has occurred in the area for decades; this proposal should not harm small-scale miners By addressing the problem now, during a hiatus in mineral exploration, this solution is ... more fair to mining ... companies than waiting until more funds are expended.”

Proposal # 97 – Implement a predator control areas plan (5 AAC 92.125) for Unit 9B, 9C, 9E. **Oppose**. Unit 9C is largely composed of Katmai National Park. In general, we are strongly opposed to the predator control implementation plans that, across broad areas of Alaska, seek to remove approximately 80% of the wolves, 60% of the black bears, and various percentages of grizzly bears. Predator control, as currently practiced in Alaska, lacks sufficient scientific backing. Defenders of Wildlife, as well as taking issue with aerial gunning of wildlife on ethical grounds, is concerned with the long-term health of prey populations and habitat conditions when predator control is practiced unscientifically – based on inadequate scientific or anecdotal data, without adequate studies to show a causal relationship between certain predator numbers and prey availability, and without appropriate experimental controls. If predator control is indicated, i.e. in order to prevent an imminent biological emergency, then Defenders of Wildlife will support it provided it is carried out by professional wildlife agency personnel in a humane and cost-efficient manner and has public support.

Proposal # 99 – Allow black and brown bear trapping in McGrath Experimental Micromanagement Area (EMMA), Unit 19D – **Oppose**. See our comments on Proposals 8 and 75. Even with “time-check” requirements, bears that are held in traps will suffer and struggle more than other furbearers, with hazards resulting to bears and humans.

Proposal # 100 – Allow taking black bear cubs and female black bears with cubs to be hunted in Unit 19 intensive management areas – **Oppose**. Defenders of Wildlife does not endorse the taking of bear cubs or female bear with cubs without clear and compelling scientific evidence that such drastic management actions are necessary. No information is presented in the proposal that convinces us that this point has been reached. Bears are slow to reproduce, and should be managed conservatively. We believe that normal hunting practices, using modern tools and stealth, can accomplish the appropriate level of reduction of predator animals, without resorting to shooting bear cubs and female bears with cubs, or taking bears from dens.

Proposal # 101 – Extend the Unit 19A predator control plan for six years – **Oppose**. Defenders of Wildlife, Alaska Wildlife Alliance, and Alaska Center for the Environment have submitted a competing proposal which would stop the aerial gunning of wolves in Unit 19A. See our rationale in Proposal 102.

Proposal # 102 – Terminate the aerial wolf control program in Unit 19A – **Support**. This proposal was submitted by Defenders of Wildlife, Alaska Wildlife Alliance and Alaska Center for the Environment. See our rationale within the proposal.

Proposal # 103 – Make it legal to disturb and destroy wolf dens in Unit 19 – **Oppose**. The practice of denning has been outlawed for many years. Destroying the young in a nest is widely condemned as an unethical style of hunting. This proposal creates the potential for unknown mortality if pups in a den are orphaned and starve because adult pack members associated with that den are taken. Taking wolves during in this manner jeopardizes sustained yield, and risks overharvest of a valuable resource.

Proposal # 104 – Extend the Unit 19D East predator control plan (5 AAC 92.125f) – **Oppose**. Defenders of Wildlife, Alaska Wildlife Alliance and Alaska Center for the Environment have submitted a competing proposal, number 106.

Proposal # 105 – Allow black and brown bear trapping by permit in Unit 19 – **Oppose**. See our comments on Proposals 8 and 75 for rationale. In addition, bears – particularly brown bears – are slow to reproduce. They should be managed conservatively.

Proposal # 106 – Terminate the wolf control program for Unit 19D East – **Support**. This proposal was submitted by Defenders of Wildlife and other organizations. We would like to point out that there are several typographical errors that slipped into this proposal during the process of transcribing our submitted proposal. At the Board of Game meeting, we will submit sufficient copies of an amended proposal which corrects these typographical errors.

Proposal # 107 – Modify the predator control plan in Unit 20E to allow the harvest of black bear and brown bear cubs and mother bears with cubs; allow use of snares for trapping bears; allow taking of bears the same day airborne; establish a working group including the Alaska Outdoor Council to recommend protocol for the bear control program – **Oppose**. For reasons stated in other proposals, we oppose the taking of bear cubs and mothers with cubs, and we oppose the use of traps and snares to harvest bears. We have strong objections to same day airborne hunting of predators for numerous reasons, including fair chase issues, harassment potential, and concern that this is management that is not conservative for species (like grizzly bears) that are slow to reproduce. Furthermore, we believe that the Alaska Outdoor Council is neither broadly nor fairly representative of hunters or conservationists in Alaska; to specifically name this group and leave out others suggests the disproportionate influence that this group has on wildlife regulatory policy decision-makers in the State.

Proposal # 108 – Institute aerial or same-day airborne wolf control in Unit 20A in order to bring moose calf survival to 45-50 calves per 100 cows in November – **Oppose**. This proposal reports that the current population of moose in Unit 20A is 14,000 to 15,000 animals but the

population objective is lower: 10,000 to 12,000 moose. The proposal acknowledges that the moose is in an overpopulated condition, yet seeks to keep it that way by further increasing the number of wolves killed. Over the last five years, 18% of all wolves reportedly killed by hunting and trapping statewide were those killed in Unit 20. Arguably, a shortage of predators is the very problem that has led to the very serious, current problem of the moose being overpopulated and above carrying capacity. Less predator control is needed in Unit 20A, not more. This proposal moves us in exactly the wrong direction.

Proposal # 109 – Increase the intensive management objective to 12,000 to 14,000 moose for Unit 20A – **Oppose**. The moose in Unit 20A show numerous, classic, density-dependent symptoms of malnourishment. The twinning rate is approximately 7%, as compared to 30% or 70% elsewhere in the state. The current intensive management objective of 10,000 to 12,000 should not be adjusted upward to the higher current, unsustainable number which is creating negative impacts on the habitat and on the viability of the moose.

Proposal # 110 – Implement a predator control plan (5 AAC 92.125) and reduce wolves in Unit 20A to inflate the population size of the Delta caribou herd – **Oppose**. See our comments on Proposals 97, 108 and 109 for rationale.

Proposal # 111 – Expand the Unit 20E predator control area – **Oppose**. See our competing Proposal 113.

Proposal # 112 – Implement a wolf control plan for Unit 21E without waiting two years for the Board to meet after the intensive management plan is drafted and adopted – **Oppose**. See our comments on Proposal 97, 99, 108 and 109 for rationale.

Proposal # 113 – Terminate the aerial predator control program for Units 20E and 25C – **Support**. This proposal was submitted by Defenders of Wildlife, Alaska Wildlife Alliance and Alaska Center for the Environment.

Thank you for giving our comments your thoughtful consideration.

Sincerely,



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