

February 13, 2004

ATTN: BOG Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 25526
Juneau, AK 99802-5526

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RE: Comments relating to Alaska Board of Game Proposals – Spring, 2004

Defenders of Wildlife (Defenders) appreciates this opportunity to comment on the 2004 Alaska Board of Game Proposals. Defenders, established in 1947, is a national non-profit organization dedicated to the protection of all native wild animals and plants in their natural communities. Our programs encourage protection of entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. We support consumptive uses of wildlife when harvests are justified by sound biological data and hunting regulations are appropriate and ethical. We also support non-consumptive uses of wildlife so that all public values and use patterns are fairly recognized. Defenders represents over 1,000 members in Alaska, and over 450,000 members and supporters nationwide. We operate an office in Anchorage. We have participated in the Alaska Board of Game regulatory process since the early 1980's, and value the opportunity to contribute our views at this time.

Attached for your reference is a spreadsheet with specific proposals and our position on those proposals. Given the large number of proposals for the 2004 meeting, we have elected to express our general and overall concerns with these requests for regulatory change.

BLACK & BROWN BEAR PROPOSALS

Defenders of Wildlife has regarded with increasing concern the number of public proposals that have sought to liberalize brown and black bear hunting regulations. In our view, there must be compelling reasons to change regulations that have traditionally benefited from being relatively uniform and conservative. Far too many of these proposals are being advanced for areas that lack current or adequate population data and most fail to recognize the sensitivity of bear populations to being over-harvested. A cardinal rule of sound bear management is that baseline density estimates must be made before significant regulation changes occur (see Unit 13A Brown bear CMR study, 1998, following guidelines developed by Miller et al.). In Alaska, conservative bear management is generally the norm for the following reasons:

- (1) frequent regulation changes have an unknown effect on harvest patterns and make Department data comparisons difficult;
- (2) unaligned season lengths in different but nearby game Management Units creates serious enforceability problems;
- (3) early spring hunting seasons lead to mechanized hunting abuses;
- (4) bears have the slowest reproductive rates of any big game animal;
- (5) the inability to directly and routinely measure population trends;
- (6) the overall difficulty and expense of obtaining bear population data;

- (7) precise models of sustainable harvest rates are difficult to develop because parameters like emigration, immigration, unreported harvests and geographically misreported harvests are all difficult to quantify for bears;
- (8) over-harvest can cause long-term damage to a population which may not be recognizable in the short term.

We oppose liberalization of black bear seasons and bag limits; liberalization of bear baiting regulations; permitting same-day airborne black bear hunting; allowing bear hides and parts to be sold; permitting bear trapping and allowing the harvest of sows and cubs.

We see little justification for these proposals. Black bear hunting seasons are already among the most lengthy in the state, affording reasonable hunter opportunity in most Units. Nuisance bears can be taken under existing defense of life and property laws. Predation control is ineffective because of the difficulty of determining which bears are targeting moose calves. Bear baiting is unsporting, conditions bears to human food, alters normal travel behavior and creates food and refuse disposal problems. Same-day airborne hunting of bears violates principles of fair-chase hunting and is inefficient as a predator management tool. The commercial sale of bear parts creates substantial enforcement problems and leads to the waste of a food resource. The harvest of sows and cubs raises sustainability and ethics concerns.

We oppose the liberalization of brown bear hunting regulations; legalizing brown bear baiting; permitting same-day airborne brown bear hunting; reauthorizing or authorizing tag fee exemptions; allowing bear hides and parts to be sold; and allowing the harvest of sows and cubs.

Many of the same concerns regarding the liberalization of black bear regulations apply even more forcefully to brown bears, which historically have been managed even more conservatively. We believe that increasing the take of brown bears to benefit moose fails to recognize that moose calves are targeted only by certain bears so that increased hunting pressure or predator control may not achieve the purpose. Studies designed to measure hunting pressure on the demographics of brown bear populations in southcentral Alaska in 1997-1998 by Testa, Taylor and Miller concluded that rates of predation by various sex-age categories of bears are poorly known and that conditions that lead to vulnerability of prey are unknown. In many of these Units, bear seasons are already among the most liberal in the state and serious questions of sustained yield and viability can be raised.

Brown bear baiting is a totally unacceptable precedent due to its likelihood of abuse and lack of enforceability, public safety concerns and its blatant disregard for the principles of fair-chase hunting. Same-day airborne hunting of bears violates principles of fair-chase hunting and is inefficient as a predator management tool. The commercial sale of bear parts creates substantial enforcement problems and leads to the waste of a food resource. The harvest of sows and cubs raises sustainability and ethic concerns. Tag fees exist to provide funding for wildlife law enforcement and management programs. Valued public resources such as wildlife should not be given away free.

Both brown and black bears are a highly valued big game resources by hunters and nonconsumptive users that should not be put in jeopardy by poorly substantiated liberal hunting seasons and bag limits for the wrong reasons. Management difficulties regarding bears are well known and should result in conservative harvests to assure sustainability.

WOLVES

We oppose proposals to rescind the Denali Wolf buffer and allow for hunting and trapping of the Margaret and Toklat wolves of Denali National Park; aerial or land and shoot killing of wolves; and liberalization of seasons and bag limits

The Toklat and Margaret wolves of Denali represent the most viewed, and first and longest studied group of wild wolves in the world. Working in cooperation with the National Park Service, Defenders of Wildlife launched its Keep Denali's Wolves Wild program last summer which was designed to teach visitors to Denali National Park about wolves and how to properly view them. Defenders distributed tens of thousands of copies of the Denali Wolf Tracker publication, prepared an eight-minute video entitled "Keep Denali's Wolves Wild" and presented over 30 slide shows on Denali's wolves at venues throughout the state. To subject this world-class viewing and research opportunity to harvest by a handful of local trappers, most of which depend on Park visitation for their livelihood, is economically, scientifically and ethically unjustified. Currently, less than 1% of state land in Alaska is closed to wolf hunting and trapping. To further reduce this area would be unfair to the thousands of Alaskans who enjoy viewing wildlife.

Aerial and land and shoot killing of wolves is an unacceptable abuse of wildlife. It is extremely unpopular with the public and results in international embarrassment and impacts to the state's billion dollar tourism industry. This extreme measure reflects badly on the ethics of hunting in general, results in wounded animals and is unenforceable. Alaskans voted twice now to ban aerial and land and shoot killing of wolves.

Eight months is already an extremely liberal season for hunting wolves. It is standard wildlife management principle not to have an open season during the reproductive period of any species. A "no limit" policy runs counter to all other bag limits for hunting and has been discouraged throughout the state's management history. Pelt quality is extremely poor beginning in April, rendering such season extensions a waste of the resource and without merit from a subsistence standpoint. Such extensions also increase the potential for conflicts with non-consumptive and tourism activities.

SNOWMACHINE HUNTING

We oppose modifying methods to allow for statewide snowmachine wolf, bear or coyote hunting.

This is a method that the state has considered as a management tool in predator problem areas only after extensive analysis of predator-prey relations. To authorize the practice in all GMU's at this time without a similar analysis would be inappropriate. In general, Defenders believes hunting wolves from snowmachines is an unsportsmanlike practice and should not be permitted. Polling shows that Alaskans by a margin of 2 to 1 strongly oppose to hunting wolves using snowmachines.

The Board of Game allows for Alaska's diverse public to participate in the decision-making process of one of the state's most important common resources, that being wildlife. We appreciate your serious consideration of our views on these proposals.

Sincerely,

Karen L. Deatherage
Alaska Program Associate