



Alaska Office

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Via Facsimile: 907-465-6094

Board of Game Comments
Alaska Department of Fish and Game
P.O. Box 115526
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To whom it may concern:

Defenders of Wildlife (“Defenders”) appreciates the opportunity to submit these written comments on proposals that will be considered at the January 2008 meeting in Anchorage, 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 and polar bears. 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 and activists in Alaska and more than one million members and supporters nationwide.

Proposal # 1 – Amend the statutes defining the crime of interference with hunting and trapping to include a prohibition on altering another’s experience of hunting, fishing, trapping, viewing, etc. – **Oppose**. The Department of Law has advised that the Board of Game does not have authority to alter statutes.

Proposal # 2 – Eliminate the permit requirement for hunting black bears with dogs – **Oppose**. To avoid abuse, a permit should continue to be required to use this specialist hunting method.

Proposal # 3 – Expand the area where hunters can fly in and shoot black bears the same day as they have flown – **Oppose**. As it exists now, only in the “liberalized hunting areas” (the predator control areas and Unit 20 south of Fairbanks) can you fly in and hunt at your bait station the same day you fly. This proposal would give further incentive to the practice of bear-bait hunting, where bait or scent lures are used and hunters are allowed to shoot bears as close as 300 feet from their aircraft. We believe this form of hunting violates accepted ethical standards of fair chase. Baiting has the potential to habituate animals to human foods, and may inadvertently boost populations of the target animals by giving them supplemental food and violates the practice of fair chase. We continue to maintain that hunters and trappers with stealth and weapons have the tools they need to harvest wolves without the use of artificial bait stations.

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Proposal # 7 – Expand the number of bait stations that guides can maintain – **Oppose**. Defenders is opposed to bear baiting for a number of reasons including public safety and fair chase.

Proposal # 10 – Open registration hunts to all statewide ADFG offices or via the Internet – **Oppose**. Registration hunts allocate limited resources. Giving preference for limited hunts to local residents is common sense.

Proposal # 39 – Restrict hunting of big game animals until after 3:00 AM of the day following the day in which one has ridden a motorized vehicle off an established trail – **Support**. This proposal should help reduce habitat degradation caused by indiscriminate ORV travel.

Proposal # 40 – Expand the practice of hunting bear cubs and mother bears with cubs – **Oppose**. In March 2006, the Board of Game began allowing this practice in the Upper Cook Inlet (Unit 16B). This proposal would expand this practice to the remaining intensive predator management areas, as well as additional areas where the annual limit is three or more bears per year. This practice should not be adopted over a wide area without demonstrated biological need. It goes against decades of tradition where cubs and mother bears with cubs have been protected from hunting. This will further diminish the reputation of some Alaska hunters because cubs will be orphaned and left to starve to death. Further, those cubs will not be able to contribute their genetics to ensure healthy future populations. We find that this proposal represents a serious violation of the most rudimentary ethical hunting standards.

Proposal # 41 – Allow for the practice of “denning,” which is the disturbing or destroying of wolf dens, the extension of the wolf hunting season to May 31 statewide, with a bag limit of 10 wolves per day, and the allowance of hunting mother bears (sows) with cubs, statewide – **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 would also extend wolf hunting season into May, when wolf pelts are no longer prime and when poor quality pelts would not be fully utilized. In addition, hunting during this period 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 this period jeopardizes sustained yield and risks overharvest of a valuable resource.

Proposal # 42 – Allow the hunting of wolves with bait, scent, or other attractants such as electronic calls, statewide -- **Oppose**. We oppose wolves and bears 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 practice of fair chase. We maintain that hunters and trappers with stealth and weapons have the tools they need to harvest wolves without the use of artificial bait stations.

Proposal # 43 – Allow same-day-airborne hunting over bait in Game Management Units 11-13 and 19-25 – **Oppose**. As indicated in our comments to the previous proposal, we oppose 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 fair chase principles. We maintain that hunters and trappers with stealth and weapons have the tools they need to harvest wolves without the use of artificial bait stations.

Proposal # 47 – Allow same-day airborne taking of wolf, wolverine, lynx, fox, coyote and bears, provided the plane is at least ¼ mile away – **Oppose**. Land and shoot has been defined by the state as “using an aircraft to locate an animal, landing the aircraft, exiting the aircraft, and immediately shooting or attempting to shoot the animal.” Same-day airborne has been defined by the state as “taking an animal without waiting until after 3:00 a.m. following the day in which the person was airborne.” We believe that both practices invite abuse of the Airborne Hunting Act. Liberalized taking of predators should only be supported when there is adequate scientific justification for doing so. Another difficulty in this proposal is the enforcement of any distance requirement. Past history has shown that these methods are abused: chasing and harassment of wildlife occurs, and direct illegal shooting. If there is a legitimate predator control purpose, then the Board of Game needs to follow procedures to establish a predator control area with harvest objectives and other requirements of law and regulations.

Proposal # 51 – Prohibit the use of electronic calls for moose in the southcentral and southwestern regions of the state – **Support**. As stated by the author, conflicts over limited resources occur if hunters leave moose calls running all night, and disturbance of breeding interaction can occur when moose are confused by electronic calls during the breeding season.

Proposal # 56 – Require traps and snares to bear the name and address of the trapper – **Support with amendment**. When traps are set in inappropriate places for conservation of wildlife and other animals, the public should be able to relay a message to the Department of Fish and Game in order that the owner can be contacted. We understand that trap identification sometimes has been resisted by trappers because of privacy concerns. To address this, the Department could determine what require identification on traps by whatever reasonable and appropriate form of identification is necessary. Identification would likely reduce wasted wildlife resources because the traps would be monitored more responsibly: the animals likely would be retrieved more quickly, avoiding loss of the catch to another animal, or the catch deteriorating over time. We believe that animals would have less chance of suffering if traps were more accountable.

Proposal # 59 – Limit the size of traps used in Chugach State Park in order to strictly limit the number of wolverines that could be caught under the existing trapping regulations – **Support**. Wolverine are scarce in Chugach State Park, and the regulation that opened trapping in the Park was adopted against Department biologists’ advice. By limiting the size of traps used in the Park, the number of wolverines trapped would be vastly reduced, ensuring their protection for the species’ conservation and for the benefit of park users who relish the opportunity to see living furbearers in the wild.

Proposal # 60 – Create a 5-mile buffer zone away from roads and trailheads in Chugach State Park where trapping would not be allowed -- **Support**. This proposal would result in support a highly covered wildlife viewing opportunity, and increase the protection of wolverines in the areas most frequented by people. This proposal, in conjunction with proposal 59, would offer substantial protection to the scarce wolverine population in this important open space area and popular park on the edge of Alaska’s largest city.

Proposal # 61 – Prohibit trapping within ¼ mile of the Parks, Glenn, and Richardson highways, and within one mile of a residence along these highways – **Support**. A buffer is needed adjacent to busy roads or reasons of public safety and conservation of scarce wildlife viewing opportunities in Alaska

Proposal # 70 – Increase the personal take of black bears statewide by allowing each individual hunter to take up to ten black bears each year – **Oppose**. This proposal is excessive and may lead to an illegal selling of bear parts. It has the potential to significantly impact bear populations in an uncontrolled manner. Bears have a much lower reproductive rate than many hunted animals, so their management should remain conservative. There's no precedent for so large a bag limit on big game animals classified as predators and furbearers. We are concerned that an excessive bag limit will lead to wanton waste and underutilization of bears. If there is a legitimate predator control purpose, then the Board of Game must establish a predator control area with specific harvest objectives, following other requirements of state statutes and regulations.

Proposal # 76 – Clarify the regulations on takings in defense of life and property to require the salvage of valuable parts to the state – **Support**. This proposal, made by ADFG, will reduce the motivation for killing wildlife out of season by requiring the salvage and surrender of valuable parts such as the hide and skull of a bear, with all attached claws; the hide and skull or fur animals or furbearers; the meat and antlers or horns of ungulates, and the meat of other game.

Thank you for your careful consideration of our comments.

Sincerely,

Tom Banks
Alaska Representative
Defenders of Wildlife

