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**TESTIMONY OF WADE WILLIS
DEFENDERS OF WILDLIFE**

**Alaska Board of Game
Spring 2009 Meeting**

Defenders of Wildlife (“Defenders”) appreciates the opportunity to comment on the regulatory proposals being considered at the Southcentral and Southwest regional Board of Game meeting. 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 imperiled species, habitat alteration and destruction, and the associated loss of biological diversity. Defenders also advocates new and innovative approaches to wildlife conservation that will help prevent species endangerment. Our outreach programs, including education programs being developed with and for Alaskans, emphasize increased protection for entire ecosystems and interconnected habitats while protecting predators that serve as indicator species of ecosystem health. Defenders represents more than 1,900 members and supporters in Alaska, and more than 1 million members and supporters nationwide.

I am the Alaska Representative for Defenders, a 19-year resident of Alaska, a former biologist for the Alaska Department of Fish and Game (ADF&G) and U.S. Fish and Wildlife Service, an active member of the Alaska Chapter of the Wildlife Society, a member of the Anchorage Regional Fish and Game Advisory Committee and a hunter.

Defenders has submitted detailed written comments on 54 proposals. Today in my oral testimony I will focus on those issues of greatest concern to Defenders.

Wolverine Trapping in Chugach State Park:

Defenders supports the proposals (22, 25 and 27) that seek to close wolverine, lynx and coyote trapping in Chugach State Park due to unsustainable harvest levels of wolverines in 2007 and 2008. Despite ADF&G testimony about concerns for overharvest, as well as broad public disapproval and testimony regarding wolverine trapping in the Park, the Board of Game based its decision to allow wolverine trapping on a non-scientific agenda that supports the expansion of trapping at the expense of all other user groups and the long term health of the Park’s wolverine population. Trapping for lynx and coyote need be terminated as well because of the risk to non-target species including dogs and wolverines. The adoption of a wolverine trapping season in the Park was a mistake and there is broad support for correcting this error. The board should adopt these proposals to protect the few remaining wolverines in Chugach State Park. (*ADF&G Wolverine Census Population Estimate Data – 2008 and ADF&G Wolverine Harvest Data 2007 & 2008*)

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Use of Helicopters by Private Citizens:

Several proposals such as 192 would allow the use of helicopters by private citizens to kill bears and wolves. Defenders opposes these proposals, in part, because the use of aircraft should only be allowed to control predators in cases of legitimate biological emergencies, and then only by ADF&G personnel. The effects of allowing private citizens to use helicopters further demonstrates that the state's predator control programs are nothing more than a guise to allow aerial hunting of wolves and bears by private citizens rather than scientifically defensible and legitimate control programs.

Helicopter use is also strongly opposed by Alaska Wildlife Troopers as promoting illegal hunting for a wide variety of wildlife, including moose. Not only do they oppose it, but the Troopers request that the Board "develop a written policy to completely eliminate any possibility of helicopter use for any type of hunting of big game by the general public." (DPS comments to BOG - Feb 09)

The Troopers further state that "by allowing the general public to use helicopters to access bait stations and associated camps during seasons when the hunting of other big game animals is open is inviting opportunities to kill brown bears, moose, wolverine and other species under the guise of accessing a bait station and associated camps." (DPS comments to BOG - Feb 09) The Troopers' concerns are especially relevant when the same-day airborne hunting is allowed in Unit 16. The Troopers have also testified about same-day airborne regulations that are allowed for one species but illegal for others at the same time: "This would give the illegal airplane hunter one more layer of defense by giving him the excuse of hunting black bear the "same day he is airborne" for a permitted bait station." (*DPS comments to BOG – Jan 08*)

And let's not forget, this would occur in a unit that allowed increased numbers of bait stations per hunter. Could there be a stronger plea from the Troopers for the board to *NOT* promote unethical, and likely, illegal, hunting in Alaska?

The Snaring of Bears:

Proposal 168, 190 and the ADF&G's preferred option recommendations all request the snaring of bears, which we strongly oppose. Snares also catch cubs of both brown and black bears, presenting a significant risk to the public should they accidentally approach a sow that has a cub which has been snared. ADF&G has also requested allowing the use of snares all summer long, when recreational use is highest by campers, fishermen, hikers, and berry pickers. The dates when black bear trapping are proposed to occur would also coincide with closed seasons for other furbearers, including brown bears, increasing the opportunities for illegal harvesting of other furbearers that would be out of season.

Another of our concerns is that the Board of Game has waived the regulations requiring the salvage of game meat in Unit 16, even though spring black bears in that area are widely considered excellent sources of very good meat. Snaring bears to support the "preferred" harvest of moose meat, when both bear and moose are high quality food source, is unethical and wasteful.

The Alaska Wildlife Troopers also oppose snaring of bears and, have clearly stated in the past: "Traditional snares and techniques are ineffective at targeting specific species, which place the hunter in violation of regulations." (*DPS comments to BOG - Feb 09*)

The Sale of Bear Parts:

Defenders opposes the ADF&G recommendation to allow the “resale” of bear black bear skulls and hides, either raw or tanned in Unit 16 because harvesting bears in any predator control programs for profit is both ineffective and inappropriate. Predator control programs were never intended to provide financial gain for a hunter or an industry.

Alaska Wildlife Troopers have long opposed any form of legal sale of bear parts due to lack of available enforcement personnel and insufficient regulatory oversight associated with verifying the legal origins of the bear parts. In other words, patchwork regulations promote the illegal harvest and poaching of bears.

Astonishingly, the ADF&G’s rationale for requesting this regulatory change is, and I quote; “to provide an incentive for fur buyers to actively participate in the program.” Based in this statement, it appears the ADF&G wants to promote methods that do not increase harvest, but that actually encourage illegal harvest, and promote a for profit, “commercial” fur industry participation in a predator control program.

This and other recommendations by the ADF&G were made, not in the proposal book, but in a separate document, “Preferred Options for Predator Control,” which was only posted very recently on the Board’s website. In our opinion, this document should have made available prior to the close of the public comment period. By adding it to the website at such a late date, it appears to be an attempt to avoid the traditional and required public notice.

Killing of Wolves and Wolf Pups Through Poison Gas, Denning, Snares and Traps:

Also in the ADF&G’s “Preferred Options for Predator Control” document for Unit 9, you will find a request by the ADF&G to authorize the use of carbon monoxide to kill wolves in dens, including pups. Defenders strongly opposes any type of regulation allowing the harvest of wolf pups during a predator control program as control should occur prior to pupping season to avoid the controversial killing of pups.

This practice of using lethal gas has never been employed previously by the ADF&G and deserves both extensive public discussion and debate. The Department submitted Proposal 190 as a request for “public input” on the use of carbon monoxide by agency personnel stating that “the department is considering, but not necessarily recommending, the use of carbon monoxide to euthanize wolves.” By floating it for discussion in Proposal 190, and then quietly, and unequivocally, recommending it as a “preferred option” in an obscure website posting, certainly suggests the Department appears to be trying to do its best to hide the request from public view.

The Department also recommends that plan language be clarified to allow ADF&G staff and the public (“agents of the state”) to trap and shoot wolves in or near dens, and to specifically allow denning. This simply dovetails with their plan, as stated by Doug Larson, to, “continue killing wolves and pups during the denning season if necessary or if simply encountered during standard field operations for Unit 9D’s predator control program.” (*Doug Larson, Director ADF&G, testimony to the BOG – Dec 08*).

To date, the Board of Game has not sufficiently addressed or discussed the needs and concerns of the public or the tourism industry when considering approving such a drastic method of harvest such as denning. The Board of Game never specifically called for proposals on the subject of denning at any of

their previous regional meetings. Without thorough and rigorous participation by the public and strong evaluation of the benefits and the costs associated with the policy, it is inappropriate to assume that a vaguely worded authorization, that does not specifically address denning, would be sufficient to fully address the needs and concerns of the public as well as essential industries affected by the decision to allow killing wolf pups in the den.

This lack of a formal public discussion on the policy of “denning” in Unit 9D, the lack of clarifying existing code changes by citing the change specifically, as well as the complete lack of clearly publishing calls for proposals specifically addressing denning, clearly highlights the limited scope and biased preferences during the Board of Game’s evaluation and decision to promote this policy. Due to its controversial nature and this lack of proper procedure, denning should continue to be illegal in predator control programs, including in Unit 9D.

New Predator Control Programs and Renewal of Current Programs:

Proposal 239, submitted by the ADF&G at the request of the Board of Game and the Yukon-Innoko Moose Management Working group, would expand predator control programs into Unit 21E. Defenders opposes this request. Our review finds that, if adopted, this would be the least scientifically defensible predator control program to date. The Department justification for this program is not based on immediate biological need, but on “potential” need, calling this unnecessary wolf slaughter an “Adaptive Plan.” Proposing to kill 80% of the wolves in an area of over 8,000 square miles when the Department has no population estimates for wolves nor any data to suggest wolves are significant contributor to moose calf mortality in the area is astonishing in its lack of scientific justification.

And last, we oppose the ADF&G’s requests to renew the current control programs and to expand them to allow Department personnel to assist private aerial gunning teams by using ADF&G helicopters to kill wolves all year long. Defenders continues to contend that none of these programs have the scientific evidence to support predator control in these areas. Instead of ending these deplorable, unscientific programs, the ADF&G’s response is to recommend escalating the programs. No science, no results, and no end to the war on predators.

Thank you for the opportunity to share our concerns today.