

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

DIVISION OF WILDLIFE CONSERVATION

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Mr. David Allen
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Unimak Caribou Herd Environmental Assessment
POB 2026
Pocatello, ID 83206-2026

Mr. Allen,

The Alaska Department of Fish and Game (Department) participated as a cooperating agency with the US Fish and Wildlife Service (Service) during preparation of the Management Alternatives for the Unimak Island Caribou Herd Environmental Assessment (EA). The Department values the opportunity to work closely with the Service and Gap Solutions, Inc to discuss the conservation needs and related biology of the Unimak Island Caribou Herd (UCH). The Department further appreciates the considerable efforts of these partners throughout the development of this EA. The following comments represent the consolidated views of the Department.

The UCH has undergone a precipitous decline in key population parameters that may affect the long-term viability of the population. Based on data from other caribou herds in Southwest Alaska, the Department identified predation by wolves as the most likely factor limiting caribou calf recruitment. This low recruitment has decreased the bull: cow ratio of the UCH, which appears to have been sufficient to decrease pregnancy rates, thereby reducing overall productivity. Absent active management, low levels of calf survival coupled with the effects of a low bull: cow ratio have the potential to drive the UCH to an extended period of low abundance or possible extirpation.

The UCH is an important resource utilized for subsistence purposes by residents of False Pass and others under state and federal law and is a necessary component of the area's wilderness character, as well as a refuge purpose. All hunting of the UCH was restricted in 2009; however, the precipitous decline of the UCH has not slowed, meaning the continued loss of an important food source for local residents.

The Department originally alerted the Service of the precipitous decline in the UCH in our December 22, 2009, letter to the Izembek National Wildlife Refuge. Department and Service staff held subsequent discussions to discuss the UCH and proposed Department management actions. Additionally, the Department prepared an analysis regarding the UCH in April 2010. In the "Environmental Review: Unimak Caribou Herd Management Options," the Department analyzed management alternatives and selected a wolf reduction program, coupled with translocation of bull caribou, as the best possible program to reverse the decline of the UCH.

Based on information gathered in the 2010 fall composition count of the UCH, the herd is still declining. Though the fall 2010 composition counts showed a minor numerical increase in the bull: cow and the calf: cow ratios, this change does not indicate an improvement in the viability of the herd. Recruitment and survival of calves is not sufficient to offset current and expected loss. The UCH remains a herd experiencing a serious decline that is in need of active management.

Described as Alternative B in the EA, the Department's proposed program provides the greatest opportunity to increase calf recruitment in the UCH, likely preventing its extirpation, as well as providing for continued conservation of wolves. Alternative B supports the Department's management responsibilities as required by the Constitution of the State of Alaska. Moreover, this alternative provides the Service the greatest consistency with federal law and policy related to management of refuges in Alaska, including the Alaska National Interest Lands Conservation Act, Refuge Improvement Act, and the Wilderness Act. The Department strongly supports selection of Alternative B.

Review of the remaining alternatives finds significant fault with each. Selection of Alternative A, C, or D at this critical juncture is ill advised and would jeopardize the sustainability of the UCH.

Alternative A

The Service cannot select Alternative A, the No Action Alternative, as it fails to meet the purposes of the Alaska Maritime National Wildlife Refuge, which include:

i) to conserve fish and wildlife populations and habitats in their natural diversity, including... caribou.... [and] (iii) to provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents.

Additionally, alternative A fails to comply with the specific intent of the Service in the EA to support a wolf reduction program as a necessary action:

The Service has determined that the ADF&G's proposal to conduct a predator control management on the Refuge is necessary, but has elected not to identify a preferred alternative pending public review of the EA." (Management Alternatives for the Unimak Island Caribou Herd Environmental Assessment, 2010)

By taking no action, the UCH would continue to decline, driving the UCH to an extended period of low abundance or possible extirpation. The Service would fail to fulfill refuge purposes that require conservation of the UCH and to provide opportunities for subsistence or any other use.

Alternative C

Alternative C mirrors Alternative B in all respects *except* that it does not allow for culling wolves from a helicopter, while all other simultaneous activities allow use of helicopters. Alternative C instead uses marksmen stationed in fixed wing aircraft or operating on the ground to cull wolves. The Department does not support Alternative C as it significantly deviates from Alternative B and severely limits the likelihood of project success for the following reasons:

- Alternative C does not comply with Service direction in 610 FW 1, the Wilderness Stewardship Policy. This Policy, at 2.20 states:

*We will initiate actions intended to alter natural predator/prey relationships only when compelling evidence exists that the proposed action will correct or alleviate identified impacts on native fish, wildlife, plants, or their habitats and would be in compliance with section 2.16. **We will direct control at the individual animal(s) causing the problem using the method least likely to adversely impact nontarget species and wilderness visitors.** (Emphasis added.)*

- Prohibiting use of helicopters to take wolves reduces the ability to take those animals causing problems, as the Wilderness Stewardship Policy requires. Fixed wing aircraft can be an

effective tool to take wolves, but reduces effectiveness of successfully culling those animals responsible for calf mortality, increases the number of wolves taken, and increases the number of years management actions may be necessary.

- Requiring use of fixed wing aircraft to cull wolves decreases effectiveness, may decrease safety parameters of staff, and increases cost. Unimak Island often has strong winds and low ceilings, conditions where fixed wing aircraft can only operate in a limited fashion. Due to the short timeframe (3-4 weeks) to conduct a successful reduction program, a helicopter is necessary to conduct all aspects of the program on days when weather prevents the use of fixed-wing aircraft.
- Many organizations have stated that if wolves must be taken, it should be conducted in the most efficient and humane manner possible, which is using Department marksmen operating from helicopters.
- Using fixed wing aircraft to cull wolves would cause greater negative impacts to Wilderness character than Alternative B due to operational increases for both helicopters and fixed wing aircraft.
- The EA does not provide a clear rationale for development of this alternative, which in effect compromises the project without any basis in science, humaneness, or efficiency.

As shown above, Alternative C does not meet the needs of the UCH, contradicts Service policy, and increases effects to wilderness character.

Alternative D

Alternative D has limited potential for meeting program objectives but its likelihood of meeting those objectives is much lower than Alternative B. Alternative D would require three to four, two-person teams deployed on Unimak Island for up to seven weeks with significant daily fixed wing aircraft support. Since this alternative will not be coupled with a mortality study, it would be a broad based reduction program as ground based teams would have a greatly reduced ability to ensure they were taking wolves engaged in killing calves. As in Alternative C, this would reduce efficiency, necessitate extending the project additional years, and require taking more wolves than Alternative B. Ground teams would have temporary but negligible impacts to Wilderness values during their extensive seven-week use of the area.

In summary, action is necessary to prevent the continued decline and possible extirpation of the UCH, and provide for the resumption of subsistence and other uses. Alternative B provides the greatest probability of increasing calf recruitment by directing efforts at culling wolves responsible for calf mortality. Alternative B is consistent with the Alaska Constitution, state law, and federal law and policy. No other alternative provides the same likelihood of success while minimizing the number of wolves culled from the population. Therefore, the department strongly encourages the Service to select Alternative B.

The Department looks forward to continuing high levels of cooperation and coordination with the Service established during development of this EA throughout implementation of this project.

Sincerely,



Corey Rossi
Director, Division of Wildlife Conservation
Department of Fish and Game
State of Alaska