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FEB 24 2011
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DATE: February 18, 2011

**SUB: Bear and Wolf Conservation, Harvest and Management Policy
Amendment Proposals**

I am very disappointed in the proposals that I see in the Alaska Board of Game Notice of Proposed Regulatory Changes. In this age of science and technology it is like stepping back into the eighteenth century when wildlife biology and ecosystems had not yet been heard of. Here I am using information technology of the 21st century to write about current issues that were laid to rest in most of the enlightened world during the last century. But now the effects of these misguided management proposals can be even worse. They did not have radios to help locate predators that long ago, or helicopters to help eradicate them, fortunately, or that piece of the wildlife ecology puzzle might have been lost forever.

This is not limited to the "management for abundance" the ADF&G tried to sell to Alaskans a few years ago. This is predator eradication pure and simple. I could see it coming during the last several years. Wolf shooting at first was limited to a few relatively small areas where moose numbers were claimed to be too low for the local residents to sustain themselves, which was later revealed to be just an excuse to enable predator control and increase trophy moose numbers for nonresidents.

Each year there were more and more of those areas where moose were supposedly too scarce for subsistence users to keep food on the table. Now, apparently, it is the entire state that is desperate for predator control. That, of course is not surprising, since most of the game is taken by non-natives who may or may not even live in Alaska.

Management decisions are routinely based on the perceived need for human food rather than any attempt to balance moose numbers with the carrying capacity of their range. This basic need is mentioned in passing, but no serious attempt to use carrying capacity as a management objective is ever made. The following quote from the BOG publication says it all: "Given the extremely high value placed on human harvest of prey species,



the option of dramatically reducing or eliminating human harvests of prey species for extended periods of time is generally not an acceptable management approach". This is not wildlife management.

Even though wolf killing has already gone too far there seems to be a push to go even further. The aerial killing program would be capable of eliminating wolves over large areas under the right conditions, especially if such tactics as denning, baiting, killing females with pups and hiring "agents of the state" were used to carry out the slaughter.

Weapons such as foot snares and aerial gunning may be used for the first time to kill bears of all ages at any time of year. This will set another terrible precedent. Alaska will be known as the state that appreciates wildlife only for its material values, especially if game animal parts are allowed to be marketed. This is especially egregious. The sale of game animal parts other than the hides of furbearers has long been considered unacceptable. When this is allowed it encourages more poaching, as has been seen already with the poaching of black bears for their claws and gall bladders.

The cost of aerial predator killing is not mentioned, but I would guess that it would be cheaper to buy meat at the grocery store than to pay for the elimination of predators to increase moose populations. And there is no mention of how it is to be paid for.

These proposals need to be reconsidered in the light of wildlife management practices supported by science. A good place to start might be the recommendations of the National Institute of Science resulting from a study commissioned by Governor Tony Knowles about ten years ago. Those recommendations were ignored at the time because they did not support the agenda of the BOG. The recommendations of many former Alaska professional wildlife biologists have also been ignored. The last three governors also have refused to appoint BOG members that would support scientific wildlife management policies, resulting in the reinforcement of predator control as the primary tool of game management. The proposals give lip service to non-consumptive uses of wildlife, but offer no substantial support for it.

I sincerely hope that, for the benefit of the future of Alaska, the BOG will begin to consider scientific management policies for all of its wildlife. It would be good for the morale of the dedicated state wildlife biologists who have had to endure the misguided ideology of the BOG for too many years.

Thank you for considering these comments.

