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RC § 18

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Defenders of Wildlife appreciates the opportunity to submit supplemental comments on proposals that will be considered at the March, 4<sup>th</sup> – 10<sup>th</sup>, 2011 Board of Game (BOG) meeting in Wasilla, Alaska.

Established in 1947, Defenders of Wildlife (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, polar bears and impacts from climate change. Our Alaska program seeks to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while recognizing the role that predators play as indicator species for ecosystem health. Defenders represents more than 3,000 members and supporters in Alaska and more than one million nationwide.

### Defenders Supplemental Comments

Defenders supports and advocates for continued public engagement in the regulatory decision-making process of the Board of Game (BOG). We also recognize that not all individuals who submit comments and proposals are wildlife professionals. However, it is our opinion that proposals submitted to the BOG often lack necessary scientific justification to support their passage. Unfortunately the majority of proposals in the March, 2011 proposal book focus narrowly on suppressing predation, failing to consider other factors that lead to low – or perceived low – moose or caribou population density: weather, displacement due to disturbance, over-harvest, excessive road mortality, lack of adequate habitat, and other factors.

Defenders continues to maintain that the State of Alaska has failed to scientifically justify their predator control programs, which are driven more by politics than science. Independent scientists and wildlife experts both in Alaska and across the

nation have criticized the single species wildlife management strategies employed by the state. We continue to urge those charged with the responsible and sustainable management of our wildlife resources – including predators – to develop a comprehensive, scientifically justifiable and socially acceptable predator control program based on the 1997 National Research Council Review.

**Amendment to Proposal 103. We *oppose* the amendment submitted by the Alaska Department of Fish and Game and urge the BOG to reject it.**

This amendment, proposed by the Alaska Department of Fish and Game (ADF&G), would add a brown bear predation management experiment to the Unit 16 predator control implementation plan.

Defenders offered extensive comments on proposal 103 – which aims to reauthorize the predator control implementation plan for Unit 16 – during the March BOG comment period which closed February 18<sup>th</sup>. These comments offered a critique of the program and provided suggestions for how to improve the plan. However, prior to submitting our comments, we had not yet had the opportunity to review the ADF&G’s comments on the Unit 16 plan. In their comments, the ADF&G proposes amending the plan to include “the addition of brown bear predation management in an experimental format.” Considering the fact that proposal 103 was developed and submitted by the ADF&G, and considering it highly probable that ADF&G was considering adding brown bear control to this plan prior to the March 2011 proposal book’s original release, we question why this addition was not included in the original proposal.

In October, 2010 Defenders provided extensive comments on the irregular process by which topics were added to the October meeting (see Defenders’ comments in the October 2010 meeting handbook). Similarly we view the proposed amendments to proposal 103 as a deliberate attempt to thwart public awareness of the scope and intent of ADF&G’s Unit 16 predator management plan. As we stated in our October comments, ADF&G is fully aware of the public’s interest in predator management issues in Alaska. By providing amendments during the comment period rather than in their original proposal ADF&G has once again restricted opportunities for the public to weigh in on controversial predator management decisions.

In addition to limiting public knowledge and input for this proposal, the ADF&G’s comments do not provide any data on brown bear predation rates, brown bear population size, or by what means they are proposing brown bear populations be reduced. We urge the BOG to reject the ADF&G’s proposed amendment in order to allow adequate time for the development of a plan and for public review.

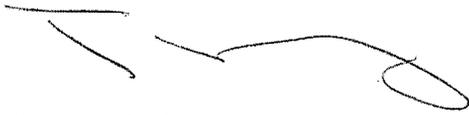
**Proposal 128.** We *support* this proposal and urge the BOG to adopt it.

This proposal aims to close the trapping season for wolverine in Units 6 and 14C.

The proponent of this proposal is concerned that the current level of harvest for wolverine in Units 6 and 14C is unsustainable. The proposal lays out clear biological justification for closing the trapping season based on previous testimony from Alaska Department of Fish and Game staff.

Thank you for considering these additional comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Theresa Fiorino', with a large, stylized flourish at the end.

Theresa Fiorino  
Alaska Representative  
Defenders of Wildlife