

Attention: BOARD OF GAME COMMENTS

Alaska Dept. of Fish & Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526 Fax 907/465-6094

Re: **Proposals 141 and 142**

I urge the BOG to reject proposal 141 and to implement proposal 142. My reasons are four: ethical, economic, legal and scientific.

**ETHICS**

**Hunting Ethics: Should harvesting bears be "fair chase"?**

As the BOG well knows, bears were once treated as vermin throughout North America. It took decades of effort by wildlife biologists educating the public about bears to win for them the status of game animals. This was done for many reasons.

First, many hunters consider bears the supreme North American trophy animal due to their physical prowess, reputation for defensive fierceness, and keen intelligence. Even though black bears are less respected than brown bears in Alaska and other areas where the two species are sympatric, most of our continent has only black bears. So most hunters in most states have high regard for black bears as trophy animals. The pride they take in harvesting a bear is directly related to the status of bears in the public mind. Degrading bears back to vermin status, as is represented by snaring, degrades bear hunting and bear hunters. Killing bears, except in DLP, should be strictly limited to fair chase methods.

Second, bears are North America's ecological equivalents of great apes. They are among the most intelligent of all land animals, and among the most ready to peacefully coexist with humans in situations where they do not perceive us as competitors for prized foods. This, along with their reputation for defensive fierceness, makes bears particularly attractive to viewers – who often find close viewing one of the most rewarding experiences of their lives. Treating bears as vermin is especially loathsome to viewers, and degrades the experience of viewing even in spots where snaring is not known to be underway.

**Is Snaring Intolerably Cruel?**

Yes, this kind of snaring is, especially if the snare is elevated so far that a snared bear would be held at least partly upright by the snare. It is cruel to the snared bear; and if this animal is accompanied by its mother or offspring, this animal's plight is cruel to them too. Anyone who doubts the cruelty should put him/herself in the bear's place and hang there for several days until someone comes along to "put you out of your misery" (by freeing you).

Contrary to statements that snared bears just sit quietly, I have seen serious wounds to the legs of snared bears, and the bears became "calm" only after violent efforts to free themselves failed and the animals succumbed to "despair" and "depression." Furthermore, when a snared bear is approached by a human, that "calm" bear can erupt in panicked aggression, as I saw numerous times when I snared bears for research purposes.

**ECONOMICS AND LEGALITY**

**Would Snaring or Any Other Form of Intensive Management Maximize Non-Hunting Benefits to Alaskans, In Accordance With Our State Constitution?** No. Quite the contrary.

The US Fish & Wildlife Service estimates that wildlife viewing generates around \$700 million per year for Alaska's economy, a big (but unspecified) fraction of which is for wolf and bear viewing (USFWS 2007). My own estimate, based on very fragmentary information, confirms a benefit of at least \$50 million annually for bear viewing. Even my own smaller estimate represents a major boon to numerous Alaskan communities, a boon that is especially important as other resource-based industries are declining. Wildlife viewing supports not only tour companies, but airlines, water taxi services, gas stations, restaurants, lodging services, and numerous other businesses.

**What Do Carrying Capacity and Sustainable Yield Have to Do With Snaring Bears?** Mistaken notions of CC and sustainable yield are the justification for Intensive Management, and thus for snaring. The BOG should demonstrate that IM justification still exists when the issue of low moose numbers is rephrased in terms that are valid both semantically and empirically.

Sincerely,

*Barb Murray*

*Nanoose Bay, B.C. 250-468-7718  
'Visitor to Alaska' - Boycotting!!!*

*PLS. DO NOT!!!  
ALLOW SNARES!!!*



**Bear With Us** Inc. #3113 Sprucedale, Ontario, POA 1Y0. Canada.  
email : info@bearwithus.org. phone: 705-685-7830 website: [www.bearwithus.org](http://www.bearwithus.org)  
**Bear With Us** Inc. is a registered charity, # 898978416RR0001

March 2, 2012

- Alaska Dept. of Fish & Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Fax 907/465-6094

Re: **Proposal 141**

**Dear BOG,**

I urge the BOG to reject proposal 141 .

You have received many letters opposing bear snaring. There are many reasons to oppose bear snaring. The following reasons are reasons to oppose not to endorse. They are ethical, economic, legal and scientific. You have received other letters with long and well explained logic regarding the ethical, economic, legal and scientific arguments. I will not repeat this.

Since you have received letters explaining why there is no valid reason to snare bears especially science based, may I ask you to take this proposal off the table now and forever. Consider the ethics of bear snaring and the ethics involved by manipulating wildlife populations for the sole reason of increasing the populations of the preferred animals to shoot at.

Thank You

Mike McIntosh

Bear With Us inc.

**Bear With Us Mission: To promote the understanding and respect for the bear family, a species near the top of the evolutionary scale, a species in direct niche competition with the human race.**

**Alaska Office**

333 West 4th Avenue, #302 | Anchorage, AK 99501 | tel 907.276.9453 | fax 907.276.9454  
[www.defenders.org](http://www.defenders.org)

March 1, 2012

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
FAX: (907) 465-6094

To Whom It May Concern:

Defenders of Wildlife appreciates the opportunity to submit written comments on proposals that will be considered at the March 2 -11, 2012 Board of Game (BOG) meeting in Fairbanks, Alaska. These comments are supplemental to those we previously submitted on February 17, 2012.

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. Our field office in Alaska focuses on conservation issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears, Pacific walrus and impacts to wildlife 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; recognizing the role that predators play as indicator species for ecosystem health. Defenders represents more than 3,000 members and supporters in Alaska.

### **COMMENTS ON ALASKA BOARD OF GAME PROPOSALS**

**Proposal 141. We *oppose* this proposal and urge the BOG to *reject* it.**

This proposal would institute black bear trapping seasons for Game Management Units (GMU) 12, 19A, 19D, 20E, and 25D, and allow non-residents to participate in black bear trapping.

The Alaska Department of Fish and Game's (ADF&G) recommendations for black bear trapping indicate that the primary purpose for establishing trapping seasons is to alleviate predation on moose calves. However, the majority of the GMUs for which regulations are proposed lie outside bear predation control areas. Further, as we pointed out in our comments on the revised bear management policy, the widespread implementation of

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bear trapping regulations circumvents the formal public process for developing predator control implementation plans. In order to uphold the public process through which controversial predator control regulations are adopted, bear trapping should only be considered on a case by case basis.

In addition to concerns above, we would also like to point out that Unit 25D is not part of a formal predator control implementation program and that the Yukon Flats National Wildlife Refuge comprises much of the Unit. The U.S. Fish and Wildlife Service holds primary management authority on the majority of these lands. Under the Alaska Lands National Interest Lands Conservation Act (ANILCA), the purposes for which the Yukon Flats National Wildlife Refuge (Yukon Flats) was established and shall be managed include:

to *conserve* fish and *wildlife populations* and habitats *in their natural diversity including, but not limited to*, ... Dall sheep, *bears*, moose, wolves, wolverines and other furbearers, ... [emphasis added].

Intentionally manipulating the natural diversity of bears found on lands designated under ANILCA utilizing highly controversial methods runs contrary to the mandates of Yukon Flats and the mission of the National Wildlife Refuge System and is therefore inappropriate.

In addition to our concern over the expansion of bear trapping and inclusion of lands where such management is inappropriate, we are also concerned that proposal 141 would allow non-residents to participate in bear trapping programs. ADF&G clearly states in its recommendations that the "complexity of implementation increases by including nonresidents in black bear trapping, particularly as regards the statute preventing take of brown/grizzly bears without a guide." Additionally, the currently approved bear management policy indicates that trapping of black bears is considered a predation control activity and is not intended for implementation under general harvest regulations. Allowing non-residents to participate in any predator control activities has been expressly prohibited in the past and should under no circumstances be allowed. Again, we strongly oppose any action which seeks to directly or indirectly expand the participation of non-residents in these highly controversial predator control programs.

In addition to our opposition to allowing non-residents to participate in these programs, we oppose the use of bear trapping as a general harvest strategy. The trapping of large mammals, including sows with cubs, causes high levels of stress and can produce extremely unsafe conditions – especially for individuals lacking sufficient training, skills or equipment to handle highly stressed animals. Furthermore, ADF&G recommends that trapping regulations require that snares only be checked every two days. Such a protracted period of time for allowing large mammals to be trapped is completely unacceptable due to impacts on the snared animal and the high level of stress caused to accompanying adults or cubs.

In ADF&G's recommendations, they state that seasons for hunting and trapping of black bear and brown bear should be aligned in order to prevent confusion should the BOG decide to allow incidentally trapped brown bears to be retained. We strongly oppose the consideration of any regulations that would allow incidentally taken animals

to be retained. We believe that legalized trapping of black bears where they co-occur with brown bears amounts to the legalization of brown bear trapping. Allowing trappers to retain incidentally caught brown bears would invite abuse of black bear trapping regulations which would be difficult to track and enforce.

**Proposal 142. We support this proposal and urge the BOG to adopt it.**

This proposal, if passed, would prohibit trapping of black bears in the interior of Alaska. We support the intent behind this proposal. Reasons for our support of this proposal can be found in our comments on proposal 141 which outline our opposition to bear trapping regulations being passed for these units.

**Proposal 146. We offer the following comments on this proposal.**

This proposal, if passed, would significantly liberalize trapping and hunting of coyotes in region III.

Our primary concern with this proposal is the proponents claim that "Coyotes are now present throughout Region III and are a threat to many game animals, especially sheep and caribou calves...they are relative newcomers to the region." When top predators decline in an ecosystem, an increase of smaller carnivores known as mesopredator release is known to occur. This trophic cascade could very well be taking place throughout Region III where top predators such as wolves have been subjected to widespread removal. Defenders has long voiced our opposition to large scale control of predators due in part to the unknown and potentially far-reaching ecological consequences such removals might have. We urge the ADF&G to conduct research to determine whether a mesopredator release is indeed occurring in this area.

If the large scale removal of top predators is resulting in a release of mesopredators, it would dictate that the BOG use more caution when considering approving such actions. Because intensive management programs continue to expand in the state, it is important for residents and biologists to recognize that these programs have consequences beyond that which is currently known for the resources on which so many rely.

**Proposal 197. We oppose this proposal and urge the BOG to reject it.**

This proposal if passed would allow black and grizzly bear snaring and same day airborne taking of bears Unit 20E.

The proponent of this proposal states that a similar proposal was denied in the fall of 2004 due to "the political and social concerns over the method of snaring grizzly bears." However, because the BOG has already moved to implement such methods of bear control in other areas, the proponent recognizes that such concerns no longer exist.

As we have noted previously, we are concerned over the expansion of controversial methods and means currently being employed or being proposed to control predator populations in Alaska. As controversial methods continue to be approved by the BOG, proposals seeking their expansion will increasingly be submitted; methods that were once

meant to be utilized under exceptional circumstances will become general practice. We urge the BOG to consider whether it truly serves the best interest of all Alaskans for such controversial methods be the standard rather than the exception for managing wildlife in our state.

**Proposal 233. We support this proposal and urge the BOG to adopt it.**

This proposal aims to establish a controlled use area (CUA) outside of Denali National Park. We agree with the proponent that discussing the establishment of a CUA would help mitigate resource use conflicts in this area.

**Proposal 238. We offer the following comments on this proposal.**

This proposal, if passed, would implement a Predation Management area in 9B. In the beginning of this proposal ADF&G states that the predation management area "consists of all Park Service lands in Unit 9(B) within the Kvichak River Drainage..." Meetings with ADF&G staff indicated that this was a typo and that National Park Lands were meant to be excluded from this program. Because predator control programs cannot be conducted on National Park lands, we hope that the BOG will take appropriate action to amend the proposal to exclude them.

In addition to our concern over the inclusion of National Park lands, we are also concerned that a Feasibility Assessment (FA) was not developed for this program prior to a proposal being submitted. According to the newly developed Intensive Management Protocol, the FA is meant to be the first document produced when an intensive management program is being considered. As we noted in our BOG January, 2012 comments, we are very concerned that this improvement to the intensive management process is already being disregarded.

In this particular case, a FA would be especially useful as illegal and out of season harvest, as well as habitat limitations, have been identified as factors contributing to the low moose population. Because these factors may play a larger role than predation in this area, it would be appropriate to assess their relative influence in advance of instituting an expensive predator control program in order to prevent an unnecessary waste of resources and avoid unnecessary culling of predators.

Thank you for considering our comments.

Sincerely,

Theresa Fiorino  
Alaska Representative  
Defenders of Wildlife

Please add to Board of Game meeting Comments

[REDACTED]

RECEIVED  
FEB 28 2002  
BOARDS

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**Support Proposal 142**

Dear Sirs (Board of Game):

We strongly support the proposal prohibiting the snaring of black bears and any other animals. When the practice started we couldn't believe that it was acceptable in Alaska. It is a cruel, unnecessary, and barbaric way to treat any animal, especially black bears. Proposal 142 is a widely researched proposal that would stop the killing of one of the animals most visitors come to your state to see. This inhumane disgusting method of killing is not done just to the males, but also to the sows and cubs. It is a horrifying way to kill anything! Humans should be above such despicable behavior. Please do not encourage this practice and consider the negative effects it will have on bears throughout the state and on tourism.

When we retired we always thought we'd come to Alaska for 4 weeks and return on a regular basis. We will not do that until your state proves they will protect their wildlife and when necessary control them in a humane manner. We tell everyone we know about the snaring of bears and they are horrified. We are suggesting to friends that they do not visit Alaska for a vacation until snaring and other unacceptable wildlife practices cease. You can do a lot to make sure this practice does not spread through the state. Independent scientists are afraid Alaska is headed the same way other states were as their bear populations dwindled or ceased to exist.

Man should be a protector not a destroyer. Please stop snaring and allow the magnificent wildlife that abounds in Alaska to thrive humanely and successfully.

Diane and Chuck Brandstetter  
5670 Carvel Ave.  
Indianapolis, Indiana 46220

I strongly support proposal 142.

Thank you

Judy Calder  
Fairbanks, AK



To whom it may concern:

I support 142

When even hunters are ethically opposed to hunting bears by snares, it would seem a no-brainer to discard this ill-conceived idea. I implore you to do the right thing and vote this horrendous plan down. I will never again vacation in Alaska if this plan passes.

Many thanks in advance for your kind consideration.

Carol A Tavani, MD, MS, DFAPA

Support 142

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Snaring is not just inherently cruel, it is a hideous way to kill OUR wildlife! Regular hunting is bad enough, but snaring is off the charts and should have zero consideration.

Gail Clark  
NY

I support Proposal 142

With global populations of all bear species on the decline and many in peril, it makes no sense to continue the reprehensible and brutal practice of hunting bears with snares. I wish to register my opposition to this senseless and vicious practice, and to say that I will not travel to, vacation in, or encourage anyone else to visit Alaska while this practice endures.

Sincerely,

J.N. Petzak

RECEIVED  
98 28 272  
BOARDS

Betsy Young  
PO Box 1185  
Chetelatoooy, AK 991674  
2/13/12

Attn: Board of Game Comments  
PO Box 115526  
Juneau, AK 99811

These comments address the proposed addition of black and grizzly bears to the unit 19A predator control. Current grizzly bear control measures are purported to be "experiments". However there is little reason to believe that adequate funding or efforts will be taken to get the necessary baseline research or long-term monitoring done. Instead money has been invested in "educating" voters on predator control (\$400,000). If intent is to determine whether reduction in bear numbers results in increase of caribou and moose numbers - actual controlled study design needs to be implemented. This focus needs to be area & species specific & must be included in the proposal to begin a control program such as the one you will discuss at the March meeting. Additionally allowing

unlimited harvesting by permittees + sale of bear hides creates incentive for overharvest. There must be measures to ensure that control methods reach and do not exceed a scientifically valid target number.

Including bear snaring along w/ sameday aircraft shooting of any sex or age bear seem unnecessary and unsporting. If we have such a need to reduce bear numbers, such an unsporting method should be the last step. Why not market specially priced tags to out-of-state trophy hunters? Before we approach treating our valued wild resources in such a manner I would like to see much more scientific support for such a dramatic need in numbers reduction. Alaska is not just a game ranch and I would hope that our Board of Game does not see it as such. The millions of dollars of revenue of tourist + wildlife watching would seem to argue otherwise.

If the need is simply to fill freezers, lets increase reindeer farming + pass out a quarter or two @ PFD time. Otherwise lets keep hunting a sport and Alaska wild.

Betsy Young



Lake County Library

A  
L  
C  
J  
Christopher Jones  
200 N Main St Ste A  
Lakeport, CA 95453-4816

95453  
796

from: GINNY DEVRIES

To Members of the Alaska Board of Game

I am writing to ask you to support proposal 142 which would prohibit black bear snaring in large sections of interior Alaska. Cubs still with their mothers could be trapped. That could be a dangerous situation for hikers. Also baited snares give Alaska a bad name since there is no fair chase.

Sincerely,  
Ginny Devries &  
Christopher Jones

Feb. 17, 2012

Brian Okonek  
P.O. Box 583  
Talkeetna, AK 99676

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

I oppose Proposal 213 to open the Yanert valley of Unit 20A to a late season motorized hunt. Please do not approve this proposal. There is great need to have areas that are closed to motorized hunting. Motorized use for hunting and other recreational activity increases every year. There is a tremendous amount of damage being done to the vegetation by this motorized use. Critical wildlife habitat is damaged and animals are pushed out of prime feeding areas by motorized use. There needs to be places where hunters that do not have or do not want to use motorized vehicles can hunt without competing with motorized hunters. More non-motorized hunting areas need to be established. Do not approve Proposal 213.

I oppose Proposal 228 to establish wolf predator control in Unit 20c. This area is often used by caribou and wolves that also range in Denali National Park and Preserve. Visitors from Alaska, the Lower 48 and around the world go to DNP to enjoy sighting wildlife. Alaska uses its' wildlife to promote tourism and seeing wildlife is a great thrill to many people. Wildlife is a resource to be shared. Do not approve Proposal 228.

I oppose Proposals 230 - 232 to liberalize the taking of grizzly and black bears in 20c by various means including trapping and baiting. It has been discovered in other places that when the top predators are eliminated there is a negative impact on the ecosystem. Bears reproduce too slowly to experiment with. Bears are a wilderness icon that draw many tourists to Alaska and Denali National Park and Preserve. This border region of the park should

not be subjected to intensive predator control. Do not approve Proposals 230 - 232.

Do not approve Proposals 227 and 229 declaring Unit 20c an intensive management area. This area that is surrounded on three sides by Denali National Park and Preserve deserves a much broader approach to wildlife management.

I support Proposal 233 to establish a controlled use area in the Wolf Townships. This would give a voice to the many stakeholders who have interest in wildlife populations and management in this area.

Sincerely,

Brian Okonek