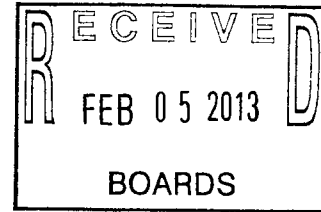




THE ALASKA WILDLIFE ALLIANCE
"LETTING NATURE RUN WILD"

RC18



February 1, 2013

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

Via Priority Mail

To Members of the Alaska Board of Game:

The Alaska Wildlife Alliance (AWA) herewith submits its written comments on proposals to be considered at the meeting for **Central / Southwest Region** regulations, February 8 -15, 2013 in Wasilla.

AWA's Mission Statement

The Alaska Wildlife Alliance is a non-profit organization committed to the conservation and protection of Alaska's wildlife. We promote the integrity, beauty, and stability of Alaska's ecosystems, support true subsistence hunting, and recognize the intrinsic value of wildlife. The AWA works to achieve and maintain balanced ecosystems in Alaska managed with the use of sound science to preserve wildlife for present and future generations.

Thank you for considering our comments.

Yours truly,

Connie Brandel
Office Manager

Proposal 49 The Alaska Wildlife Alliance **supports** this proposal

Bears have a notoriously slow reproductive rate. To allow the continued take of two bears per hunter means the possibility of over-harvesting the population before it can be detected and reversed.

Proposal 50 The Alaska Wildlife Alliance **opposes** this proposal

The sale of animal parts often leads to illegal taking of wildlife in an effort to take advantage of a new market. The black-market sale of animal parts already fuels a good deal of the illegal take, and this would only serve to make such abuses easier to hide.

Proposal 51 The Alaska Wildlife Alliance **opposes** this proposal

Such a wide-open liberalization of black bear hunting would mean many sows being killed as well as the possibility of sows with cubs being taken, leaving the cubs to starve to death. It is quite telling that the proposal notes no improvement to the quality of the resource as a result of this increase in hunting.

Proposal 52 The Alaska Wildlife Alliance **supports** this proposal

Non-resident hunting opportunities should be the least of concern in managing Alaska's wildlife. Non-residents tend to want to kill the best of the population and in doing so exert a constant culling effect which is only deleterious to the population's overall health. In any situation where a population is faltering, non-resident hunting should be the first activity restricted.

Proposal 58 The Alaska Wildlife Alliance **supports** this proposal

With a resident take that is 70 percent of the total and little regulation of that aspect of hunting in an area that should actually be administered for the welfare of the wildlife, it is essential some restriction be placed on the brown bear hunting in the preserve.

Proposal 60 The Alaska Wildlife Alliance **supports** this proposal

The overly liberal harvests presently allowed by the BOG for wolves on federal lands are scientifically indefensible and the result of pressure by special-interest groups with little concern for proper management. The state has so far shown itself to be a poor partner in respect to the original management agreements for such lands.

Proposal 61 The Alaska Wildlife Alliance **opposes** this proposal

Consistently the state has shown that when Intensive Management is emplaced it is rarely if ever removed even after target goals have been reached. IM becomes a facile

response to a complicated situation, providing what seems like benefits at first only to backfire later, as has been seen in GMU 20A moose populations.

Proposal 74 The Alaska Wildlife Alliance **opposes** this proposal

Taking brown bears via baited stations is very poor management in that it does not distinguish between gender or age. A sow with cubs taken this way means the loss of two generations in one event. It is an indiscriminate method and ethically is so repugnant even the president of Safari Club International has spoken out against it.

Proposal 75 The Alaska Wildlife Alliance **opposes** this proposal

With their very low reproductive rates, taking brown bears via baited stations is very poor management. It does not distinguish between gender or age. A sow with cubs taken this way means the loss of two generations in one event. It is an indiscriminate method and ethically is so repugnant even the president of Safari Club International has spoken out against it.

Proposal 76 The Alaska Wildlife Alliance **opposes** this proposal

Brown bear snaring, like black bear snaring, results in the deaths of male and female, young and old. As such it is an uncontrolled method of killing that can easily lead to abuse and serious declines in species which have some of the lowest reproductive rates.

Proposal 77 The Alaska Wildlife Alliance **opposes** this proposal

Bears have some of the lowest reproductive rates among Alaska's wildlife species. To allow such indiscriminate killing of bears of both genders and all ages could easily precipitate a population decline that would be difficult to reverse.

Proposal 78 The Alaska Wildlife Alliance **opposes** this proposal

Such liberal seasons and limits would essentially be a free-for-all on all bears, regardless of gender or age or species. This sort of deregulation could easily lead to a drastic drop in bear numbers that would take a long time to reverse, assuming such could be done at all. This is a proposal for indiscriminate killing.

Proposal 79 The Alaska Wildlife Alliance **supports** this proposal

The loss of revenue is one consideration. More importantly, removal of such fees leads to over-use of the resource. As no recent, reliable figures on the population are available, the bear numbers could easily drop with little warning. Tag fees allow a certain amount of regulation in an uncertain situation.

Proposal 82 The Alaska Wildlife Alliance **supports** this proposal

The genuine value of wolves in healthy numbers leading to a healthy ecosystem is beyond question. The indication of that realization in this proposal is worth noting.

Proposal 84 The Alaska Wildlife Alliance **opposes** this proposal

There is no citation of a study determining predation is the chief cause of the low herd numbers. Additionally, once predator control has been instituted by the BOG it has rarely reversed itself even after goals have been reached. An excellent example of this poor decision-making is the McGrath area where moose numbers were found to be at or above target levels and yet IM continues.

Proposal 85 The Alaska Wildlife Alliance **opposes** this proposal

Again, IM is being used as a fast and easy response to a situation that may require a different answer. Are there studies showing predation is the chief factor for the decline, rather than available forage, nutrition of forage, human hunting pressures, etc? Without that data, IM becomes a dangerous farce, enacted whenever someone feels there are too many wolves or bears without regard to proper data.

Proposal 86 The Alaska Wildlife Alliance **supports** this proposal

A 2010 petition of more than 500 signatures, many of them local residents, requested this area remain closed to wolf killing. Instead, the BOG opened it at the request of only five trappers with the result the Grant Creek Pack lost its only reproducing female under rather horrific circumstances. None of the trappers involved rely on trapping as a main revenue source and the killing of the female was almost done in a "recreational" manner as even the pelt was unusable due to the wolf being left in the trap for over a week. This area contributes to a national resource, not just a state resource, and should be treated as the special area that it is.

Proposal 100 The Alaska Wildlife Alliance **supports** this proposal

It is demonstrative of how poorly implemented Intensive Management is that it allows non-resident hunting in an area where it has determined there exists an emergency. Such continued abuse shows the true purpose of IM is not to restore healthy populations but rather to drastically reduce predators so non-residents can compete with residents for a limited resource.

Proposal 101 The Alaska Wildlife Alliance **supports** this proposal

To allow hunting on the same day as one drives into an area on an ORV is to leave an opportunity for hunting abuses that would be exploited by the unethical segment of

hunters. ORV's provide a strong advantage just in the access they provide over hunters who cannot use them, and as such they need to be balanced in their usage to even out the playing field.

Proposal 103 The Alaska Wildlife Alliance **supports** this proposal

Reviews should be performed at least annually whenever aerial killing programs are active, especially with an eye towards ending such programs as soon as possible rather than the present practice of allowing them to continue long after their goals have been met.

Proposal 104 The Alaska Wildlife Alliance **supports** this proposal

Bear snaring is an indiscriminate method of killing that allows little control and can do considerable harm given the very slow reproductive rate of bears.

Proposal 105 The Alaska Wildlife Alliance **supports** this proposal

There is no biological indication such a program is needed in the area. Additionally, such indiscriminate snaring kills two generations with one snare when a sow with cubs is trapped. For bears which have slow reproductive rates, the effects of such programs are magnified.

Proposal 108 The Alaska Wildlife Alliance **supports** this proposal

This is an example of aerial killing being allowed to continue far past any defensible target numbers. ADF&G shows no moose calf mortality due to wolves, yet the program goes on in what can only be surmised is an ideological purpose rather than a scientifically justifiable reason.

Proposal 119 The Alaska Wildlife Alliance **opposes** this proposal

Such liberalization amounts to an effort to eradicate a species and is not warranted by the data.

Proposal 120 The Alaska Wildlife Alliance **supports** this proposal

If there is a need to control coyote numbers, and no data has been presented stating such is a desirable goal, then it should be a controlled situation rather than a free-for-all.

Proposal 121 The Alaska Wildlife Alliance **supports** this proposal

Allowing wolves to be taken while they are still raising their young is a double-generation kill effect. Pelts are not marketable during this period so this amounts to nothing more than waste of a resource sanctioned by the state.

Proposal 147 The Alaska Wildlife Alliance **supports** this proposal

The removal of a predation factor in an area where moose are likely already at the carrying capacity of their range could prove to be as great an error as the infamous situation now prevailing in GMU 20A. Aerial killing of wolves should be ended in 15A to reflect the ratio of moose per available forage.

Proposal 152 The Alaska Wildlife Alliance **opposes** this proposal

Has the effect of liberalizing the brown bear season when it is already sufficiently open to hunting.

Proposal 153 The Alaska Wildlife Alliance **opposes** this proposal

This would open the season further for brown bears when the season already provides ample hunting opportunity. No supporting citations are included to support what is mainly anecdotal belief.

Proposals 154,155 & 156 The Alaska Wildlife Alliance **opposes** these proposals

Bear baiting is a lazy man's unethical approach to hunting. To add brown bears to the harvest makes it all the worse given the slow reproductive rate of all bears.

Proposal 157 The Alaska Wildlife Alliance **opposes** this proposal

The resource which wildlife represents should be fully utilized whenever an animal is killed. Bear hides and skulls have a long tradition of value in addition to the meat and therefore should also be taken.

Proposal 158 The Alaska Wildlife Alliance **opposes** this proposal

This would function as a de facto Intensive Management program, decimating a species which has a low reproductive rate without the necessary data gathering to demonstrate any such need.

Proposal 159 The Alaska Wildlife Alliance **opposes** this proposal

Without necessary supporting data this amounts to an Intensive Management activity.

Proposal 160 The Alaska Wildlife Alliance **opposes** this proposal

This amounts to nothing less than an attempt to totally eradicate wolves from the two units. As IM programs are already in place there is no need to add additional hunting pressure with little or no control. Lactating females would be open to incidental take with resultant starvation of pups, an adjunct both inhumane and resulting in the loss of two generations at one stroke.

Proposal 172 The Alaska Wildlife Alliance **supports** this proposal

Sufficient opportunity already exists to take wolves without extending the effort in such a way as to bring about starvation of pups and the resultant loss of two generations with each dead lactating female.

Proposals 173 & 174 The Alaska Wildlife Alliance **supports** these proposals

Bear snaring is both controversial and indiscriminate in its mortality. Given how slowly bears reproduce, a snared sow means the cubs must also be killed. This is the loss of two generations in a situation where such intensive killing is not justified by the data.

Proposal 175 The Alaska Wildlife Alliance **opposes** this proposal

This amounts to nothing less than Intensive Management being emplaced without the necessary data to justify it.