PROPOSAL 247

5AAC 92.110. Control of predation by wolves.

Discontinue lethal taking of wolves under predation control implementation plans as follows:

I recommend:

Non-lethal predator control only.

Discontinuation of all "Judas wolf" programs.

Full protection of all wolves in a ten mile boundary surrounding federal conservation areas, state and national parks.

Prohibition on killing of wolves, including pups, during seasons of reproduction and care of the young.

An end of all aerial hunting of wolves.

What is the issue you would like the board to address and why? The current methods used to manage wolves in Alaska, as explained in previous letters:

- Are based on poor science and inadequate predator/prey population surveys;
- Are not scientifically peer reviewed;
- Do not recognize or protect natural variability of dynamic ecosystems;
- Do not account for the growing ecological impacts of climate change;
- Are designed for mostly urban, not rural subsistence, hunters;
- Are not supported by many Alaska citizens;
- Can result in prey populations exceeding habitat carrying capacity, thus degrading habitat;
- Can lead to unintended consequences, including increasing predation due to immigration of predators into control areas;
- Prioritize consumptive use of wildlife over non-consumptive use, contrary to the Alaska constitution; and
- Produce little scientific evidence that the programs are effective.

It is time for reputable, professional wildlife scientists in ADF&G to admit such practices harm more than helping.

I urge you to do the following:

- 1. Discontinue all lethal programs of so-called predator control and institute only non-lethal methods.
- 2. Immediately discontinue and disallow "Judas wolf" programs which undermine the health of the ecosystem.

3. Directly prohibit any taking or hunting in any form of wolves within 10 miles of federal and state parks, conservation units and other protected areas. As experts and lay persons know well, the range of wolves does not necessarily adhere to government delineated boundaries, and without protections, wolves will be eliminated from areas which should be safe for them.

I am not a resident of Alaska. When I visited Alaska, I was appalled by the dominance of the "bad boy" hunter mentality in which frankly ignorant views are promoted over scientific ones, and in which torture and cruelty to valuable predators is not just tolerated but encouraged. Please work to revise your so-called predator control laws. Wolves help maintain a healthy ecosystem and lead to better prey hunting for those who choose to do so, not worse. Let science and not ignorance prevail. You have the power to make the change.

Sincerely, Lydia Furman MD

Member of Alaska Wildlife Alliance

PROPOSED BY: Lydia Furman	(EG-F21-022)
***************************************	*********