

On behalf of the Alaska Wildlife Alliance membership, staff, and Board, we submit the following comments on 2024 Interior proposals.

Proposal 51: Oppose

This proposal seeks to change the trapping season for muskrat in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C to align with the beaver trapping seasons in those units (i.e. shift muskrat season from November - June to September until June) to allow for simultaneous open water trapping of these two species in the fall, winter, and spring.

While we understand the Board's interest in reducing regulatory discrepancies between game units, we encourage the Board to inquire as to why the muskrat season starts November 1 as opposed to September, and ensure that there are no conservation concerns with harvesting muskrat in the fall. Muskrat populations are not widely surveyed in the state, so we encourage the Board to consider the latest available data (including the implications of no data) in their deliberations.

Proposal 52: Oppose

This proposal seeks to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers under a trapping license in all of Region III. We oppose this proposal because we believe artificial light (headlamp) is sufficient in winter months, as has been practiced for decades.

Proposal 55: Oppose

This proposal seeks to establish a positive Intensive Management (IM) finding for moose in Unit 19C.

We oppose this proposal for the following reasons:

- 19C does not meet 5 AAC 92.106(b) criteria "accessibility to harvest". At the March 1998 Interior Region Board of Game meeting the board discussed adopting an IM finding for Unit 19C and ultimately adopted a negative IM finding; one reason given was the lack of access. There is only one landing strip, and the unit is too remote to conduct moose surveys. Should this population have a positive IM finding, the Board must likely establish population and harvest objectives. Given the difficulty of surveying the unit, as well as the current lack of surveying, the Board must consider if the State can maintain survey standards under IM to lawfully manage IM under this finding.
- We presume the interest in establishing IM for moose is to request the State support predator reduction efforts to bolster moose populations (see proposal 60). We support Alaskan subsistence, and encourage the Board to wait until the harvest implications of the non-resident cap established in RY23 are better understood. Basing IM findings and objectives on historic harvest levels that are mostly 1) non-resident and 2) expensive (fly-in) does not accurately reflect the subsistence value of the moose in that Unit to residents.
- If there is a positive finding for moose and the harvest objective falls low because the non-resident harvest cap is suppressing effort, we feel this would be a back-door strategy to

invoke predator control when the limiting factor is not predators, but hunter effort. Falling below a high harvest objective wouldn't mean there's not enough moose, but would more clearly reflect that 19C is a difficult and expensive area to hunt. This could be a likely future as, on average, residents harvested 57 moose and nonresidents harvested 67 moose annually between RY 13-22. In RY22, 183 moose were harvested with 73 taken by residents and 110 by nonresidents. If the harvest is low following the RY23 change, we urge the Board not to conclude that the moose population is declining because of predators, but because this moose population is only being managed/surveyed by harvest data and the harvest regulations have undergone extreme reductions.

- If the Board does find a positive IM finding for moose, we strongly encourage the corresponding harvest objective to be based on scientifically-ground population estimates. We fear that the Board will apply an unrealistically high harvest objective that would be far above the average resident harvest. We fear that a poorly-reasoned harvest objective would invoke predator control when predators aren't the cause of low harvest.
- In our understanding of ADFG's comments, the resident harvest has never exceeded 100 moose. We understand that the IM statute does not discern non-resident vs resident harvest in its harvest criteria, but we oppose creating IM plans for the benefit, primarily, of nonresidents. This discussion could be included in 5 AAC.92.106 criteria (d) "level of hunter demand: as reflected by total hunter effort, number of application for permits, or other indicators".
- We encourage the Board to explore the criteria under 5 AAC.92.106 (c) "utilization for meat' a population that is used primarily for food" in the context of non-resident hunters. Does the Department have an understanding of how many non-residents use the moose for food or trophy (how much of the non-resident meat is donated?)

Proposal 57: Oppose

This proposal seeks to modify the IM Plan for Unit 19 to include 19E.

We understand the administrative burden facing the Department with the split of 19A and 19E, however, this proposal copies the bear and wolf population data from 19A directly. Before adopting a Predator Control program in 19E, the Board must understand the bear and wolf population densities (and therefore consequences of proposed Predator Control) in the *specific subunit* it is adopting. As the proposal currently reads, the bear and wolf populations are exactly the same in 19A and 19E, leading us to believe that the data were based on 19 A/E together, not individually.

Without this level of analysis, the Board may inadvertently pass a Predator Control program with unknown effects on the 19E bear and wolf populations.

Proposal 58: Oppose

This proposal seeks to authorize a predator control program in 19A.



By ADFG's admission, the 2004-2009 wolf control program was unsuccessful, and discontinued because of a lack of success removing wolves. Reasons for the lack of success primarily included land status which was a mix of private and federal lands, and poor snow conditions. While the primary private landowner has given permission, our understanding is that the majority of this program would not be permitted by federal land managers. Additionally, reliable snow conditions are still a challenge and likely to continue or worsen. Finally, and most importantly, **population objectives are currently being met.**

We understand that this proposal was requested by the Board to investigate a 2020 proposal, but neither the evidence for needing this program nor the logistics for implementing it are provided.

Proposal 60: Oppose

This proposal seeks to allow aerial predator control without a positive IM finding for moose in 19C.

We strongly oppose this proposal for the following reasons:

- 19C does not meet 5 AAC 92.106(b) criteria "accessibility to harvest". At the March 1998 Interior Region Board of Game meeting the board discussed adopting an IM finding for Unit 19C and ultimately adopted a negative IM finding; one reason given was the lack of access in Unit 19C. There is only one landing strip, and the unit is too remote to survey. Should this population have a positive IM finding, the Board must likely establish population and harvest objectives. Given the difficulty of surveying the unit, as well as the current lack of surveying, the Board must consider if the State can maintain survey standards under IM to lawfully manage IM under this finding.
- We support Alaskan subsistence, and encourage the Board to wait until the harvest implications of the non-resident cap established in RY23 are better understood. Basing IM findings and objectives on historic harvest levels that are mostly 1) non-resident and 2) expensive (fly-in) does not accurately reflect the subsistence value of the moose in that Unit to residents. Nor does this reflect the moose population - it simply reflects hunter effort.
- If there is a positive finding for moose and the harvest objective falls low because the non-resident harvest cap is suppressing effort, we feel this is an illogical strategy to invoke predator control when the limiting factor is not predators, but hunter effort. Falling below a yet-to-be-determined harvest objective wouldn't mean there's not enough moose, but would more clearly reflect that 19C is a difficult and expensive area to hunt. This could be a likely future as, on average, residents harvested 57 moose and nonresidents harvested 67 moose annually between RY 13-22. In RY22, 183 moose were harvested with 73 taken by residents and 110 by nonresidents. If the harvest is low following the RY23 change, we urge the Board not to conclude that the moose population is declining because of predators, but because this moose population is only being managed/surveyed by harvest data and the harvest regulations have undergone extreme changes.
- If the Board does find a positive IM finding for moose, we strongly encourage the corresponding harvest objective to be based on scientifically-ground population estimates. We

fear that the Board will apply an unrealistically high harvest objective that would be far above the average resident harvest. We fear that a poorly-reasoned harvest objective would invoke predator control when predators aren't the cause of low harvest.

- In our understanding of ADFG's comments, the resident harvest has never exceeded 100 moose. We understand that the IM statute does not discern non-resident vs resident harvest in its harvest criteria, but we oppose creating IM plans for the benefit, primarily, of nonresidents. This is discussing could be included in 5 AAC.92.106 criteria (d) "level of hunter demand: as reflected by total hunter effort, number of application for permits, or other indicators".
- We encourage the Board to explore the criteria under 5 AAC.92.106 (c) "utilization for meat" a population that is used primarily for food" in the context of non-resident hunters. Does the Department have an understanding of how many non-residents use the moose for food or trophy (how much of the non-resident meat is donated?)
- This proposal would be extremely constantly for a unit that sees highest participation (historically) from non-residents, does not have a moose survey program in place, and is hardly hunted outside the Farewell area.

In short, this proposal is in response to a predator problem that doesn't exist. If harvest is low because of access, or because the non-resident harvest was capped, that does not mean predators are suppressing the moose population.

Proposal 61: Oppose

This proposal seeks to allow the take of wolves in Unit 19C the same day a person has been airborne and create an Intensive Management Plan for Unit 19C. We oppose this proposal because same-day aerial wolf hunting is prohibited unless part of an Intensive Management program. We also opposed the creation of an IM program in 19C for the reasons stated in comments on Proposal 60. Succinctly, there is no positive IM finding for moose in 19C, and no harvest objective to warrant whether harvest has fallen below an IM objective. If/until those criteria are met, and IM program cannot be enacted.

Proposal 62: Oppose

This proposal seeks to establish an IM program for 19C. We oppose this proposal for the reasons stated in comments on Proposals 60 and 61. We appreciate the proposer's interest in working with ADFG to understand wolf carrying capacity to find a wolf population that is sustainable for wolves and amenable to the communities. Many predator control programs are enacted in the state with very old, or at times non-existent predator data (as was the case in the establishment of the Bear Control program in Mulchatna). We support the proposer's interest in ecosystem health, which includes predators such as wolves.

Proposal 73: Oppose

This proposal seeks to reauthorize the Intensive Management plan for Unit 21E for six years.

Before re-authorizing this plan, we implore the Board to consider the following commitments and recommendations set forth by the Operational Plan for this program (set to expire in 2022). Particularly, the “other considerations” on Page 8 of the Operational Plan for Intensive Management of Moose in Game Management Unit 21E Document Version [6], [November 2016]:

“The perceived decline in moose numbers during the mid-1990s may very well have taken place, however the department has no data to document this. Currently, moose numbers appear to be high again, and the population in Unit 21E is well above the density objective established in this plan. However, the BOG and GASH AC want to remain proactive by having an IM plan in place if a future decline is detected. In Unit 19A ADF&G was not able to measure a response in moose densities with wolf control alone. Unit 19D research demonstrated a substantial reduction in predation rates following both wolf and bear removals (Keech 2012). Using this case history, it was determined that a reduction in bear numbers would also be required in Unit 19A.

Based on this experience, a BCFA is also established as part of this plan. However, we also recommend that a calf mortality study be initiated to assess the impact of bear predation in Unit 21E before any predator reductions begin. Unit 21E is unique with very high concentrations of moose in the winter, and assessing the influence of various sources of mortality is important. The bear control conducted in Units 19A and 19D required substantial financial and staff resources. For those reasons, conducting a calf mortality study in Unit 21E will be central to focusing predator removal efforts in a cost effective manner.”

Therefore, we encourage the Board to determine:

- Is there a decline in the moose population to justify extending the Predator Control program?
- Has the Predator Control been effective? If not, will continuing the program make it more effective?
- Has the Department conducted the calf mortality study it recommended?
- Can the Department measure the response of moose density with wolf control in this program?

Proposals 93: Oppose

These proposals seek to lengthen the brown bear seasons in 19B and C by 22 days. The proposers’ interest in this regulation stems from an interest in suppressing bear predation on moose, caribou and sheep.

We are concerned that these proposals are seeking to step around the rigorous and expensive demands of a scientifically-based IM program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas.

The Department comments that the existing bear harvest is “stable” at 35 bears per year. Bears that pose a threat to the ungulate hunting seasons may still be taken as DLPs. We encourage the Board to

explore how much the bear harvest would be likely to increase in this 22 period, and the mechanisms for ADFG to ensure there is not an overharvest.

Proposal 94,98: Oppose

These proposals seek to increase the bear season in 19C by 52 days (currently 273 days, increase to 325 days). This would increase the hunting season by 16%, and create a management system where during the 365 days of the year, only 40 days are closed.

The estimated bear population is 260 bears, with harvest levels averaging 22 bears per year. This proposal seeks to extend the bear season by 52 days. With no cap on harvest or participation, how many bears are estimated to be taken in ADFG's admission that "additional bears [will be] harvested" with the additional 52 days of hunting time? Assuming the harvest rates stay the same across the proposed open period (with paired hunter effort), that would lead to approximately 4 additional bears harvested. That would increase the human harvest from 8% of the bear population (22 of 260 bears) to 10% of the bear population (26 of the 260 bears).

Sustainable harvest rates have been difficult to pinpoint in Alaska. In a simulation study, the maximum sustainable harvest rate for a highly productive brown bear population with minimal levels of natural mortality was estimated at 5.7% (Miller 1990a,b). Other studies have estimated lower sustainable harvest rates (2-3% for Yukon bears [Taylor et. al 1987). In an intensively-studied portion of 20A where most bears had been marked, harvests of 6.5% of the marked population did not immediately affect the number of adult females, but harvests of 14.3% resulted in significant declines (Reynolds and Boudreau 1992). While we recognize that this hunt does not include sows with cubs, we encourage the Board to seek information from the Department about what a sustainable harvest rate could be, and determine if the season length ensures a sustainable rate.

Proposal 96, 99: Oppose

These proposals seek to increase the bear season in 19C by 22 days (currently 273 days, increase to 295 days). Assuming the harvest rates stay the same across the proposed open period (with paired hunter effort), that would lead to approximately 2 additional bears harvested. That would increase the human harvest from 8% of the bear population (22 of 260 bears) to 9% of the bear population (24 of the 260 bears).

Sustainable harvest rates have been difficult to pinpoint in Alaska. In a simulation study, the maximum sustainable harvest rate for a highly productive brown bear population with minimal levels of natural mortality was estimated at 5.7% (Miller 1990a,b). Other studies have estimated lower sustainable harvest rates (2-3% for Yukon bears [Taylor et. al 1987). In an intensively-studied portion of 20A where most bears had been marked, harvests of 6.5% of the marked population did not immediately affect the number of adult females, but harvests of 14.3% resulted in significant declines (Reynolds and Boudreau 1992). While we recognize that this hunt does not include sows with cubs, we encourage the

Board to seek information from the Department about what a sustainable harvest rate could be, and determine if the season length ensures a sustainable rate.

Proposal 97: Oppose

This proposal seeks to increase the bag limit to 2 brown bears per year and increase the seasons in 19C by 52 days (currently 273 days, increase to 325 days). This would increase the hunting season by 16%, and create a management system where during the 365 days of the year, only 40 days are closed. Additionally, it could double the bear harvest if every hunter takes 2 bears instead of the previous 1/year limit.

The estimated bear population is 260 bears, with harvest levels averaging 22 bears per year. Keeping the same bag limit (1/year) and assuming the harvest rates stay the same across the proposed open period (with paired hunter effort), that would lead to approximately 4 additional bears harvested. But if the Board approves all of this proposal and increases the bag limit, **that could increase the harvest to 52 bears** (double the historic average(22x2), plus the 52 day increase with a 2 bear bag limit (4x2)). That would increase the human harvest from 8% of the bear population (22 of 260 bears) to **20% of the bear population (52 of the 260 bears)**.

Sustainable harvest rates have been difficult to pinpoint in Alaska, but 20% far exceeds a sustainable level. In a simulation study, the maximum sustainable harvest rate for a highly productive brown bear population with minimal levels of natural mortality was estimated at 5.7% (Miller 1990a,b). Other studies have estimated lower sustainable harvest rates (2-3% for Yukon bears [Taylor et. al 1987]). In an intensively-studied portion of 20A where most bears had been marked, harvests of 6.5% of the marked population did not immediately affect the number of adult females, but harvests of 14.3% resulted in significant declines (Reynolds and Boudreau 1992). While we recognize that this hunt does not include sows with cubs, we encourage the Board to seek information from the Department about what a sustainable harvest rate could be, and determine if the season length ensures a sustainable rate. Should historic trends continue, this would open the door to almost a quarter of the 19C bear population being lawfully taken in one year. This proposal simply asks for too much, too soon.

Proposal 105 - 107: Oppose

These proposals seek to allow hunting of black and brown bears with the use of bait or scent lures in Unit 21E. Bear baiting has spread rapidly across the state in recent years, often without detailed review of the bear populations that are baited. Should baiting be permitted, we strongly encourage the Board and the Department to consider how increased hunter effectiveness (via baiting) impacts harvest levels, the bear population, and bear habituation to bait/food near population centers. We also request that the Board and Department track the number of bait stations, as low baiting participation seems keystone to the Department's support of these proposals. Finally, we oppose the Department's recommendation to consider allowing the take of brown bears at bait stations in Unit 21A the same day the person has flown, provided the hunter is 300 feet from the plane.

Proposal 108: Oppose

This proposal seeks to reactivate wolf control in a portion of Units 12, 20D, and 20E for the proposed benefit of moose.

We support the component of the proposal that seeks cooperation with Tok forestry to allow habitat enhancement for moose. We oppose the Predator Control components of this proposal:

In reviewing the Operational Plan for Intensive Management of the Fortymile Caribou Herd in the Upper Yukon–Tanana Predation Control Area, we seek clarification from the Board and the Department:

- Wolf control was suspended in the UYTPCA in RY18, as part of a 9–year evaluation of the program being conducted during RY15–RY23. This research will document the recovery of the wolf population in the control area as part of this evaluation. This research must be considered in deliberations to reinstate this program.
- Success of aerial wolf control by the public has been variable during the life of the program, largely depending on late-winter tracking conditions. Additional department effort will be necessary in years of active control when public permittees have reduced success. For example, RY08–RY17 required considerable operational funding and staff time. This will continue to be a major consideration in the future when department wolf control is conducted.

The Alaska Wildlife Alliance acknowledges that Intensive Management can be applied to temporarily increase the recreational harvest of moose, caribou, and Sitka black-tailed deer on State of Alaska lands. We recognize that control of predators is a wildlife management tool that in some circumstances may be appropriate to restore or prevent the extinction of rare or threatened species, small populations, and insular populations such as those on islands. In limited circumstances, control of wolf populations can have a positive but temporary effect on mainland populations of moose and caribou. In some placed-based situations around communities, predator reduction may be needed to control disease (e.g., rabies) or ameliorate negative human-wildlife conflict.

However, AWA has the following concerns regarding IM and other efforts to reduce predator populations in Alaska broadly, and in this proposal:

- We are concerned that IM population and harvest objectives have not been reassessed since their inception as recommended by the Alaska Chapter of The Wildlife Society (Alaska Chapter of the Wildlife Society. 2013. Position statement intensive management of big game in Alaska (adopted June 2013).
- We are concerned that ADF&G and BOG have neither established a standard to determine if the “prey population is feasibly achievable utilizing recognized and prudent active management techniques,” nor a process to disapprove IM action if it is likely to be “ineffective, based on scientific information.”



- We are concerned that predator control has effectively become the default mechanism that the BOG uses to accomplish the IM law's desired outcome of sustaining or increasing ungulate harvest.
- We are concerned that big game management in Alaska has become a process whereby population objectives for wild ungulates are established based on public demand rather than on habitat capacity, promoting unsustainable management.
- We are concerned that "sustained yield" as currently defined in AS 16.05.255(k)(5) is an artificial construct that does not appropriately consider large scale variation in native ungulate populations that occur because of wildfire regimes and cyclic insect defoliation, as well as the cascading effects of rapid climate change including the recent immigration of mule deer and white-tailed deer from Canada and the likely introduction of ungulate pathogens.
- We are concerned that the economic costs of sustained predator control at landscape scales are generally so high that sustained yield becomes a euphemism for subsidized yield (in fact, the need to apply predator control is antithetical to scientifically-accepted definitions of sustained yield).
- We are concerned that the secondary ecological (e.g., loss of marine derived nutrients) and economic (e.g., loss of wildlife viewing) effects of predator control are not considered.
- We are concerned that other human sources of ungulate mortality (e.g., moose-vehicle collisions, illegal and unreported harvest) are being ignored in the current BOG's interest in promoting predator control.
- We are concerned that predator control undermines the ethos of humans learning to coexist with wildlife.
- Lastly, we are concerned that predator control promotes a utilitarian view of wildlife as commodities rather than recognizing the intrinsic value of all wildlife (including large carnivores) and sustaining intact ecosystems.

Proposal 109: Oppose

This proposal seeks to allow wolves to be killed in Unit 12 the same day a person has been airborne. The Board of Game can only allow the take of wolf same-day airborne under a predator control plan for which a permit is required. No such program is in place for Unit 12.

Proposal 116: Oppose

This proposal seeks to implement a non-intensive management predator control plan within the Tok Management Area (TMA) via aerial coyote and wolf control. We oppose this proposal on technical and substantive grounds.

Technical opposition: The Board of Game can only allow the take of wolf same-day airborne under a predator control plan for which a permit is required. If the goal is predator control, we seek clarity on what 'non-intensive' management means and how the Board could lawfully mandate or regulate predator control without an IM program.

Substantive opposition: The proposer, nor the Department, has provided evidence to suggest that wolves and/or coyotes are a significant source of mortality for sheep in the TMA. The decline of sheep is largely a climate and habitat issue; according to scientific literature, scapegoating wolves and coyotes has been deemed ineffective by any medium-long term measures.

Proposal 120: Oppose

These proposals seek to increase the brown bear bag limit for residents within Unit 12 from one bear to two bears per year. In consideration of this proposal, we encourage the Board to explore current harvest levels and the impacts of potentially double harvest on the Unit 12 bear population. Further, the Board must consider Federal Subsistence Board regulations, particularly on the Preserve lands.

Proposal 122-123: Oppose

These proposals seek to increase the wolf hunting season in Units 12 and 20E by six weeks, allowing harvest during late spring and summer months. The fur is in poor condition during these times, suggesting that the Board would only be approving this as an unofficial predator control effort. Without comments from the Department, we cannot determine if this poses a risk to the wolf population, but encourage the Board to inquire during deliberations of these proposals.

Proposal 136- 138: Oppose

Proposal 136 seeks to allow brown bears to be taken over bait in Unit 20D south of the Tanana River, and require a registration permit; Proposal 137 seeks to allow brown bears to be taken over bait in all of Unit 20; Proposal 138 seeks to allow brown bears to be taken over bait in Unit 20D south of the Tanana River.

We comment in opposition to these proposals based on the [Brown Bear Management Report and Plan, Game Management Unit 20D](#). In the Conclusions and Management Recommendations section (page 9), the report reads (with our emphasis added):

“The Unit 20D brown bear population should be monitored closely, especially now with the newly added baiting season. Brown bear populations in Unit 20D south should be the primary focus of study and population monitoring, especially the areas with a high degree of developed access, such as the area west of the Gerstle River. Bear populations should be monitored closely to assess long-term effects of liberal hunting regulations, road-accessibility, and human habitation. There has been much public interest to allow brown bear baiting in southern Unit 20D with multiple proposals at the last 2 Board of Game meetings asking for liberalization in this area. The Delta Fish and Game Advisory Committee (Delta AC) made informal and formal inquiries to the department about harvestable surplus of brown bear populations. The Delta AC stated they support increased brown bear harvest but wanted to ensure the department has science-based information about brown bear population dynamics. They would like this information to be available to the AC before they make recommendations to the Board of Game regarding proposals that would liberalize brown harvest. The Delta AC was one of the biggest

proponents in authorizing brown bear baiting in Unit 20D at the 2017 board meeting. They also supported allowing baiting in Unit 20D north only at this time until new data is available to show that baiting in Unit 20D south would be sustainable. We recommend we continue to work with the Delta AC to provide the most up-to-date information available to help guide them in their decision-making framework.

As of now, with the information available, the department is not comfortable with additional harvest pressure in Unit 20D. Total harvest and especially percent females in the harvest are at the maximum level within our harvest objectives that were developed based on DuBois 1995 estimate. It will likely be difficult to get a more detailed population estimate in the next few years because of the lack of a financially feasible technique being available. We remain committed to analyzing all available Unit 20D data that is available to the highest degree possible, including harvest data and collar tracking data regarding brown bears in this area. We also recommended a full population estimate of Unit 20D brown bears, especially Unit 20D south when funding and a technique becomes available to complete such an estimate. While the 5-year female harvest is averaging right at the recommended limit of 45%, and overall harvest is creeping up since the initiation of baiting in RY17 harvest trend data and anecdotal observations suggest the brown bear population is stable in Unit 20D. Therefore, no changes to the hunting season dates and bag limits are recommended at this time. With brown bear baiting only being authorized since RY17 very little harvest data is available at this time and the effects may not be fully noticed well into the next reporting period; therefore, harvest should be monitored closely during the next reporting period.”

Essentially, Unit 20 and particularly 20D, have seen growing hunting pressures in recent years. We share the same concerns outlined in this Department report that increasing bear hunting in this area should only be approached with caution.

Proposal 146, 148: Oppose

These proposals seek to adopt and implement a wolf Intensive Management program and wolf control program in Unit 24A and 25A.

There has never been an IM program in 24A or 25A, but an IM program in 24B was suspended in 2018. In the recommendations of the [2018 report](#), the Department states “Predator control activities have been suspended in Unit 24B, and the department recommends that this program remain inactive. We will continue monitoring the results of the program through moose harvest estimates and periodic population surveys.”

The Board must find compelling reasons for the development of IM, assessed against the criteria set forth by statute. Further, the Department would need to conduct a Feasibility Assessment and Operational Plan. In short, this proposal does not provide evidence to the degree required for an IM finding, and without such a finding wolf control cannot lawfully be permitted.

Proposal 147: Oppose

This proposal seeks to allow same-day aerial wolf hunting in Units 24 and 25. The Board can only allow the take of wolf same-day airborne under a predator control plan for which a permit is required. No such program is in place for Unit 24 or 25.

Proposal 149, 150, 151: Oppose

These proposals seek to lengthen the wolf hunting season in Units 24 and the remainder of 25, and proposal 151 seeks to increase the bag limit to 10 wolves. Aside from predator control, the authors cite no additional rationale for the season expansion. The Board can only enact predator control through an IM program. With pelt quality being poor in October, we are concerned that these proposals seek to step around the rigorous and expensive demands of a scientifically-based IM program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas.

Proposal 152: Oppose

This proposal seeks to establish a resident two bear bag limit for residents in Units 24C and 24D *and* establish a fall bear baiting season in Unit 21B and 24B. We oppose this proposal on the grounds that it seeks multiple changes in different game units. Each of these changes should be considered individually, given their regional differences and potential impacts to bear populations.

Proposal 165: Oppose

This proposal seeks to create wolf control program in Unit 25D.

There has never been an IM program in 25D, but an IM program in 24B was suspended in 2018. In the recommendations of the [2018 report](#), the Department states “ Predator control activities have been suspended in Unit 24B, and the department recommends that this program remain inactive. We will continue monitoring the results of the program through moose harvest estimates and periodic population surveys.”

The Board must find compelling reasons for the development of IM, assessed against the criteria set forth by statute. Further, the Department would need to conduct a Feasibility Assessment and Operational Plan. In short, this proposal does not provide evidence to the degree required for an IM finding, and without such a finding wolf control cannot lawfully be permitted.

Proposal 166: Oppose

This proposal seeks to add bucket snaring under trapping regulations as a legal method of taking black and brown bear in Unit 25D. Alaska Wildlife Alliance and our membership *strongly* oppose this proposal on the grounds that bear snaring is indiscriminate, cruel, and unethical.

Besides the many wildlife conservationists who oppose snaring on moral grounds, many wildlife scientists find the practice to be ethically repugnant, as demonstrated by their statements against bear

snaring [when the issue was last before the Board in 2012. Public outcry was so robust.](#) even the former Governor Tony Knowles joined the testimony.

John Schoen, a former Fish and Game bear researcher and a wildlife scientist, in collaboration with other biologists, wrote a statement highly critical of bear snaring. It reads:

Bears are usually snared by hanging a bucket of bait in a tree. When a bear reaches into the bucket for the bait, its front leg is caught (trapped) by a cable attached to the tree. The only way the bear can be released by the hunter/trapper is by shooting it. If a female with first year cubs is snared and killed, the cubs will most likely starve or be killed by another bear. Unlike hunting, where a hunter can carefully select for large, male bears, snaring is indiscriminate. Snares catch black bears and brown bears, female bears with cubs, and sometimes even older cubs. With unlimited numbers of snares and long open seasons, snaring may kill more bears than is sustainable. Snaring and killing of bears regardless of age, species, and gender is incompatible with the scientific principles and the ethics of modern wildlife management, including the North American Model for Wildlife Conservation.

David Klein, another former state biologist and professor emeritus at the University of Alaska Fairbanks Institute of Arctic Biology and among the most acclaimed of Alaska's wildlife scientists, expressed:

"the need to emphasize to the BOG that we speak not just as old and retired ADF&G biologists who understand bear biology, but also as a majority of Alaskans who value bears as part of Alaska's wild heritage and who also have pride in the concept of hunting ethics that has guided wildlife management and associated sport and trophy hunting in Alaska's past. . . . Bears are generally held in high regard by most Alaskans who expect ethical behavior of both hunters and nonhunters toward bears."

Larry Aumiller, who managed the McNeil River State Game Sanctuary for three decades, also briefly participated in bear research that involved ground snaring: *"I helped snare bears in the 1970s [for radio-tracking] and it produced images that I still find in my dreams. When snared, brown bears go absolutely crazy with fear and tear up everything within reach."*

Former Board Chair Ted Spraker has claimed that BOG members and state wildlife managers "strive to adopt harvest or removal techniques that are acceptable or at least understandable to the majority of the public."

To our membership, and the majority of the Alaskan public, **bucket snaring is neither acceptable or understandable.**

While certain types of trap sets kill animals quickly, bear snares keep their normally wide-ranging captives handcuffed in place in a way that can only be traumatic, and can do so for indefinite periods (there is no trap-check requirement). The public, by and large, is not comfortable with bear snaring either. One example is the outcry from Juneau in 2018 when [two black bears were snared and euthanized.](#)

We understand the proposer's interest in increasing bear harvest, but bait stations and liberal hunting seasons are enough. Should the Board consider passing this proposal, we encourage you to deliberate the image this sets forward about Alaska's wildlife management. Should a video of bears suffering in bucket snares be released, Alaska's reputation would be rightfully damaged. As the Board setting the management direction for wildlife, we urge you to oppose this proposal on grounds of decency and humane harvest.

Proposal 182: Oppose

This proposal seeks to lengthen the brown bear season in Units 20A, 20B, and 25C by two weeks.

This proposal seeks extensions in multiple subunits with an unknown impact on brown bears. We agree with the Department that, if the board is interested in providing more brown bear hunting opportunity in this area, then the Board should adopt only one of the proposals rather than all of them, so as to increase opportunity incrementally rather than at a large scale (for example, not increasing both spring and fall seasons). If the Board seeks an extension of hunter opportunity, we recommend Proposal 183 as it is the most moderate.

Proposal 184: Oppose

This proposal seeks to lengthen the bear hunting season in 20A by 21 days. We oppose this proposal because it is too dramatic a change, particularly when the Department lacks data on the population size of brown bears in Unit 20A and only manages on harvest data. We agree with the Department that, if the board is interested in providing more brown bear hunting opportunity in this area, then the Board should adopt only one of the proposals rather than all of them, so as to increase opportunity incrementally rather than at a large scale (for example, not increasing both spring and fall seasons). If the Board seeks an extension of hunter opportunity, we recommend Proposal 183 as it is the most moderate.

Proposal 185: Oppose

This proposal seeks to extend the brown bear hunting season in 20A and 20B by 30 days. We oppose this proposal because it is too dramatic a change, particularly when the Department lacks data on the population size of brown bears in Unit 20A and 20B and only manages on harvest data. Both areas have a high density of hunters that hunt using bait in the spring; hunter opportunity, per the Department's comment, is already abundant.

We agree with the Department that, if the Board is interested in providing more brown bear hunting opportunity in this area, then the Board should adopt only one of the proposals rather than all of them, so as to increase opportunity incrementally rather than at a large scale (for example, not increasing both spring and fall seasons). If the Board seeks an extension of hunter opportunity, we recommend Proposal 183 as it is the most moderate.

Proposal 186: Support

This proposal seeks to restore a prohibition on wolf harvest in within portions of Unit 20C; those portions of Uniform Coding Unit (UCU) 0607, 0605, and 0502 west of George Parks Highway and bounded by Denali National Park on three sides.

Alaska Wildlife Alliance has long-supported a solution to the “wolf buffer” issue. A historical context is helpful:

- 1980: ANILCA Senate Committee cites the need to bring wolf townships into the Park in future land exchange.
- 1985: State proposed bringing townships in the Park in exchange for the Kantishna/Dunkle Mine being excluded from the Park. No action taken.
- 1992: First and largest “wolf buffer” covering 800 square miles along eastern boundary.
- 1993: Three months later, BoG eliminated the buffer in retaliation of Gov. Hickel’s suspension of wolf control programs in other parts of the state.
- 2000: BoG passes smaller (29 square miles) buffer in western Stampede Trail.
- 2001: Gov Knowles proposes transfer of Stampede Trail/townships to UAA, to then sell to NPS. Legislature declines proposal.
- 2001: ADFG requests to enlarge buffer to 72 square miles. BoG approves.
- 2008: Independent biologists petition ADFG Commissioner to enlarge buffer to 300 square miles. Commissioner declines.
- 2010: BoG hears many proposals to expand buffer. BoG declines all expansion proposals, eliminates buffer entirely, imposes 6-year moratorium on any proposals.
- 2012-2016: Requests for Emergency Closures, submitted proposals. All declined.
- 2013-2016: Traction for a land trade between USDOl and State for conservation easement. Election in 2016, proposal was dropped.
- 2016: NPS requests move trapping closure 6 weeks earlier to prevent overlap with bear baiting, BoG approves.
- 2016: Fairbanks Borough adopts resolution calling on Governor to establish buffer, Governor declines.
- 2017: HB105 requests 500 mile buffer. Bill dies in Senate Resources Committee.
- 2017: BoG denied proposals to re-establish wolf buffers. Was talk of Governor executed Special Use Area, never materialized.
- 2018-2020: Petitions for Emergency Closure, mostly denied.
- 2020: NPS proposal to shorten season. AWA supported. All wolf conservation proposals in corridor denied.

The pendulum has swung back and forth over the decades, and this issue will continue to rise to the Board of Game unless a compromise is reached. We support this proposal because it is moderate in size, yet creates contiguous protections for wolves moving in and out of the Park within the townships.

In Alaska, wolves are among the most desired species for viewing (Shea & Tankersley 1991), and state wildlife management includes mandates to provide for multiple uses, including non-consumptive uses such as wildlife viewing (Alaska Department of Fish and Game 2006). Wildlife viewing also brings an important socio-economic benefit to the state of Alaska, with wildlife viewing activities in Alaska supporting over \$2.7 billion dollars in economic activity in 2011. Forty percent of visitors to Alaska reported hoping to view wild wolves during their visit. (ECONorthwest 2012). More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali), provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park (Manning & Hallo 2010).

The National Park Service's wolf study is also among the oldest in the world, providing key data on predators in Denali's changing landscape. For the sake of the variety of users who enjoy this area, and the scientific value of the Stampede Corridor in contiguous research, we support this proposal.

Further, this small closure area would have minimal impact on area trappers. Per National Park Service [Proposal 152 in 2020, page 2 reads:](#)

"It should also be noted that the presence of the buffer did not decrease the average annual number of wolves harvested in UCUs overlapping the Stampede Corridor (UCUs 502, 605, 607), in fact harvest was higher during the years the buffer was in place (Alaska Department of Fish & Game 2013); note that these UCUs extend beyond the buffer area. During the presence of the buffer zone, harvest of wolves adjacent to DNPP (7 ± 11.25 SE) was on average greater than during the period without the presence of the buffer zone (2.6 ± 4.3). Simultaneously the buffer was associated with substantially increased wolf sightings (Borg et al 2016). Therefore, it is reasonable to conclude that closure of wolf hunting and trapping in an area within the Wolf Townships would present the optimal solution in meeting both consumptive and non-consumptive objectives of state and federal management agencies, and benefit about 400,000 visitors to Denali NPP with potentially a greater likelihood of observing wild wolves."

This moderate buffer would have minimal impact on trappers, as nothing east of the Park would be included and wolf trapping is permitted in the remainder and surrounding game units. We truly seek resolution and believe this could be an amenable compromise.

Proposal 187: Oppose

This proposal seeks to lengthen the wolverine trapping season Units 20A, 20B, 20D, and 20F by two weeks to align with 20C. We do not support liberalizing harvest seasons based on regulatory convenience alone. Should the Board wish to unify the regulations across game units, we recommend that instead of changing four subunits to match 20C, the Board aligns 20C's regulations with 20A, 20B, 20D, and 20F.