

RC 27

# January 2012 Alaska Board of Game Proposals 38, 39, and 40

Falcon take by species and year, 1990 through 2011.

Year	Species							Total	
	Peregrine Falcon	Gyr Falcon	Northern Goshawk	Great-horned owl	American Kestrel	Merlin	Harlan's Red-tailed Hawk		Red-tailed hawk
Unk		1							1
1990								1	1
1992		2							2
1993	1	2						1	4
1994		1							1
1995			2						2
1996	1	3							4
1997	2	7	2			1		2	14
1998	6	2	1		1	3			13
1999	3	3	5		1				12
2000	4	3	4				1		12
2001			3						3
2002	1	2	2		2		1		8
2003	1	6	3	1				3	14
2004	5	8	2			2	1	1	19
2005	1	4	4					1	10
2006	1	1	3			1		2	8
2007	1	5	6					2	14
2008	2	1	4			2		1	10
2009			3					1	4
2010	5	3	6	1				1	16
2011	3	4	5						12
Total	37	58	55	2	4	9	3	16	184

submitted by ADF+G

13 January 2012

**Tyonek Fish & Game Advisory Committee Meeting Minutes of January 6, 2012**

RC 28

Members Present: John Standifer, Chad Chickalusion, Al Goozmer, Donald Standifer

Members Absent Excused: Larry Heilman, Randy Standifer, Brandy Standifer

Members Absent Unexcused: Randall Jones

Public Present: Betty Vacka, Al's sister Annabell

Agency Staff: Troopers S. Lanier and Doug Massie; Sherry Wright ADF&G

Meeting began at 11:20 am

Troopers came to observe and listen to the meeting. Regional enforcement officer has expressed concerns about the problems residents of Tyonek have witnessed. Unsecured blind bear bait and trap stations, no marking and dead bear on the side of the road system found between Nicholi and Chacachatna river system. If the troopers go on the radio and say they are heading to Tyonek, by the time they get there, the people have already cleaned up their sites – perhaps they are also listening in. Bones and bear parts were found but had been cleaned up by the time enforcement came – enforcement is supposed to be on a secure channel on the radio. Concern of transporters dropping off people and not following the regulations was expressed. Flying too low has been observed and it is believed they are also spotting game. These things were observed around Sept 10<sup>th</sup>. Also observed a person shoot a moose from an airplane that was not accessible to retrieve – guess it was just so they could say they shot one.

The response to calls that have been made has not been satisfactory, making the people in Tyonek feel that calling anything in is irrelevant. The GMU used to be patrolled by the Soldotna post, but Mat Valley troopers are covering the area now. The troopers have built a cabin on the near a river north of Beluga River on the Kustotan River. Major projects and discussion of road construction and the potential of more people coming to the area will add to the concerns. An office for troopers in Tyonek would be a good idea, if/when those projects come to pass. The troopers want to work with the people in Tyonek and expressed the desire to stay ahead of the game to address these issues. They distributed cards to the AC to make their contact information available.

This is a good starting point and there are hopes of building rapport for better communication with enforcement and the community. Black marketing kings off the Susitna River also has been observed and is a problem with the king returns failing. One member observed people taking kings and someone with a helicopter picking up fish and taking them off site. There is a feeling in Tyonek of being the scapegoat for others wrong-doing.

The troopers said one breakdown in communication is the lag time between when someone observes something illegal and when it is reported – documentation and pictures are very helpful so they can jump on the issue and that helps them make a solid case. They have to go to great lengths to prove a case. The people in the area are the best resource for enforcement.

## Tyonek Fish & Game Advisory Committee Meeting Minutes of January 6, 2012

Reports of illegal kill of a moose on the road system north of the Chuitt River and observing moose kill but not salvaging the meat from it. Non-residents are flying in to Beluga harvesting Tier II moose. Aircraft were reported landing on the duck flats between Nicholi and McArthur River.

These are things we can work on and change – letting the people know we are working together. Getting quicker response when we do make contact will go a long way to encouraging those relationships to get better. Troopers requested if those who are willing could generate a document of places and dates where violations typically occur – that would help enforcement make better use of their time in the field and hopefully help remove those violators. Currently, they show up blind – not really sure about where or when they should be staking locations. There was also an offer to come and pick up a person to fly over pre-season so they will actually see the areas where there are problems. Efforts to improve communication and relationships are something that both the members of the AC and the troopers expressed at the meeting.

Another problem discussed was sport duck hunters that are shooting and not retrieving their game. The fact that these problems have been ongoing with little or nothing done about it has contributed to the frustration and lack of trust. Everyone is hopeful that the relationships can improve and change for the better will be forthcoming.

Consideration of the circumstances – example of a trooper cutting the nets in an instance where the tides were such that it was impossible to pull the net in because it was stuck and Cook Inlet tides are some of the strongest in the world - left a bad impression – one where the enforcement seemed to have tunnel vision, where they could have used common sense and their discretionary authority.

Beluga were decimated in five years and found parts of them in stores in Anchorage – again a misuse of the resource. The disparity of harvest was also discussed.

The Tribal Corporation was involved in the Wounded Warrior project that helped harvest bears. Tier II winter hunt is slated for removal in 2013 – there is no biological reason for that. Another item is closure of predator control. Hundreds of bears and wolves have been harvested from the area in the predator control program. Every animal has a cycle of high and low – there is a feeling that predator control is a bad idea. It is man trying to play God. When one species is low, the people used to live off another species. When they come back, they came back stronger. If you kill off the alpha male and female, they just scatter the packs of wolves.

Al provided a report that included harvest data and information salmon, subsistence fishing, subsistence clams, hooligan harvest, moose, predator control. (attached)

Apache projects are seismic projects the Native Corporation is currently working on. PacRim is winding down on some of their permitting. Watana Dam is another project (between Paxson and Cantwell on the Susitna).

## **Tyonek Fish & Game Advisory Committee Meeting Minutes of January 6, 2012**

Tyonek is the only native village tribe on West Cook Inlet. Development of the area and proactive planning "2011 and Beyond" article will help advise of upcoming projects.

There was a spider-web of easements all over Western Cook Inlet that took about 10 years to get many of them lifted.

The floor was opened for elections: Donald Standifer, Chad Chickalusion and Betty Vacka were nominated to fill the three year regular seats by unanimous consent.

The committee discussed election of officers. John Standifer is Acting Chair until committee officer elections can be held when the committee can get a quorum.

A discussion of sending someone to the Board of Fisheries shellfish meeting. The need to re-submit the proposal regarding mesh net size (would be due April 10<sup>th</sup>).

The student representative forms were also left so they can be taken to the students. Al passed the gavel to John Standifer.

Meeting adjourned at 1:30 pm.

Alaska Department of Fish and Game

Tyonek Fish and Game Advisory Committee

Al Goozmer, Chairman

Report

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BOARDS  
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*Salmon*; Salmon and related fishery report at:

Through our efforts, some progress was made in the area of equity and distribution of these resources for *commercial use*. There still remain inequity, the imbalance remain in favor of the drift net fleet. It was my intention to bring this issue to light, strike a unified effort to bring a balance, and to increase harvest opportunities through change in fishing gear to the time allotted.

I would suggest pushing more proposals as we have done in the past, as the TAC continue to be a voice in the ADF&G, you will be heard and let the Department know that their reports indicate the problem.

*Subsistence fishing* is also slow to change, change has taken place since 1981, but the balance on resources, specifically the king salmon we use has been taken away from us, for the most part on the restriction of gear and time.

I believe the TAC should continue to push for gear and time to adequately harvest the resources to meet our needs

*Subsistence clams*; As of this report our proposal to reinstate our area on the Polly Creek as *Tyonek Subsistence area* (proposal 373). The BOF in Juneau this week, I have no report.

*Hooligan harvest*, reports indicate, during the past recent years the fishery has harvested over 100,000 pounds a season. One year the report indicates a harvest of 126,000 pounds.

It is my suggestion that TAC make a concerted effort to bring this harvest to an end. This resource is vital for the salmon, seals and beluga and other species.

*Moose*, ADF&G and other report at;

The tier II is slated for elimination for the 2013 season.

There are no scientific reasons for this proposal but I speculate that other special interests are involved, and I would suggest a battle plan for this move.

*Predator control*, No report, on brown bear, black bear, I believe this practice has gone on long enough, there are no control measures in the harvest. Reports of carcasses left on side of road, snaring area unmarked, again no control measures.

P425

I would suggest the TAC coordinate a program with the enforcement division to work with you to ensure our needs are met and outside interests are controlled.

Other areas of interest are the rodent and small predator population. As the major predators are taken out, the small predator increase very rapidly, this is the case we now see. There are no concerns at this time, but the issue should be monitored close.

It was a pleasure to serve with you and I know that diligent effort to improve our opportunities to harvest the resources will be met.

Al Gozmer, Chairman

8585



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RC 29

January 13, 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:

Due to an oversight, we did not submit comments on Proposal 131 prior to the December deadline. We offer them now for your consideration.

**Proposal 131. We offer the following comments on this proposal.**

This proposal, if passed would add black and brown bear predation reduction to the Unit 19A predator control program.

Unfortunately, the final plan for this proposal will not be released prior to our submitting comments. However, Defenders is concerned over the continual expansion of controversial methods and means employed to take predators in the state. In the fall of 2011 we also summarized our unease over the recent changes to the bear management policy. The policy was subsequently approved by the BOG.

We are also particularly concerned over the expansion of bear control in areas where bear populations have not been adequately surveyed or where harvest reporting for bears is not required; both of these concerns are pertinent to this proposed program. While the placeholder proposal does not include population objectives, in other areas where predators are being controlled reductions of 50-75% are routine. Both black and brown bears tend to have low reproductive rates and are prone to overexploitation. In the absence of robust population surveys and adequate harvest reporting, an unsustainable population decline would be difficult to detect.

In addition to concerns over whether bear populations have been adequately assessed, we continue to be concerned that robust wolf population surveys have also not been completed in most areas where predators are targeted for reduction. We also continue to be apprehensive over the fact that the long-term ecological

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affects of reducing one or all major predators is currently unknown and is not being measured.

Absent robust population surveys, and without answering vital ecological questions, it is impossible to determine whether target population levels for wolves and bears are adequate to maintain population viability and ecological function. We urge ADF&G to conduct robust predator population surveys in all areas where predators are being reduced in order to insure that the long-term viability of predator populations is secured as is mandated by the Alaska Constitution. Because such reductions have proven ecologically detrimental in other areas of North America, we also urge that studies be undertaken to assess the ecological effects of broad scale long-term predator reductions in Alaska.

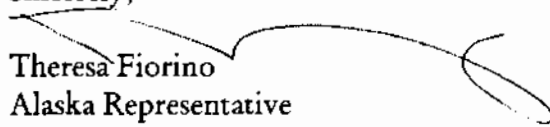
*Addendum*

It has come to our attention that this program proposes aerial bear control as a means to control bear predation on moose in 19A. We oppose the aerial control of bears in Alaska and urge the BOG to reject this means of reducing predation.

Thank you for considering our comments.

Sincerely,

Theresa Fiorino  
Alaska Representative  
Defenders of Wildlife







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LC 30

January 13, 2011

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

**RE: Supplemental comments on proposals 35 and 36 for the January, 2012 statewide Board of Game meeting**

To Whom It May Concern:

Defenders appreciates the Board of Game's decision to defer action on proposals 35 and 36 for discussion at the January meeting. By delaying the decision, the BOG has respected the public process, allowing those who will be directly affected to more easily participate in the meeting.

Defenders originally submitted comments on proposals 35 and 36 for the Arctic meeting on November 11-14, 2011 when they were originally to be discussed. On December 21, 2011, we resubmitted comments on proposals 35 and 36 with our prepared comments for consideration at the state-wide meeting January 13-18, 2012. The following comments are supplemental and incorporate our response to select components of the Feasibility Assessments for Units 15A and 15C.

Before providing specific comments, we would like to make a few general statements regarding these proposals. It is our view that approval of these programs - which are designed to theoretically "reallocate" moose from wolves to humans - would set a precedent for eliminating all standards under which Intensive Management (IM) can be considered. Since approval of aerial control on the Kenai would enforce a position that IM is appropriate in any location and under any circumstances, recent attempts to improve the IM programs through the development of the Intensive Management Protocol will be rendered meaningless. Additionally, associated documents such as the new Feasibility Assessments (FA) will be obsolete before demonstrating their utility. In our opinion if the BOG approves aerial wolf control on the Kenai, the BOG will have succeeded in eliminating any scientific credibility of these management programs, disregarding years of work aimed at program improvement and setting the bar for implementing these programs at the lowest level since the passage of the IM statute.

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In addition to our concern over the continued degradation of IM program standards, we have numerous concerns over the shortcomings of the FAs. We find the FAs for both units to be wildly speculative. The FAs provide little evidence to support the documents' claims or assumptions, and in some cases exclude data that contradicts these claims and assumptions. Overall, the documents fail to convince judicious readers that aerial wolf control is necessary, or could feasibly achieve the stated goals.

The documents fail to sufficiently analyze, and often attempt to downplay, the significant challenges such programs would face in terms of successful implementation, including land-ownership patterns, development of alternative harvest strategies, design and implementation of adequate monitoring programs, interpretation of results, and cost. Moreover, the documents do not address the significant and negative public reaction that the proposals to conduct aerial wolf control on the peninsula have already invited and will continue to draw. Lastly, the documents fail to sufficiently explain how these programs can be appropriately implemented under the IM statute.

One final issue we would like to raise concerning these proposals relates to the fact that the area biologists responsible for managing the local moose populations were not on hand to testify during the November meeting in Barrow even though these proposals were considered at the meeting. Since local biologists are the only ones who have the expert knowledge to evaluate current conditions in these units, we consider this a serious oversight. We are unaware of any IM program being passed absent testimony by staff from the region where it was to be instituted and we urge the BOG to request that ADF&G rectify this situation at the upcoming meeting in Anchorage.

### Specific Comments on Proposal 35

Defenders strongly believes that proposal 35 - specifically aerial control of wolves - advances the wrong approach for managing moose populations in 15A. The program is biologically unjustified and is unlikely to achieve its objectives. Further, monitoring of results will be difficult and the proposal to control wolves has sparked controversy in the region. We strongly urge the BOG to forgo consideration of aerial wolf control in this unit.

As outlined in the FA, habitat is the primary limiting factor for moose in 15A. However, the FA is equivocal on what the program might accomplish, stating first that that the goal is to increase the moose population through aerial wolf control but then stating that "any significant predator reduction activities aimed at increasing the moose population size without associated habitat improvements may result in increased nutritional stress and decreased productivity." In section 4 of the FA, ADF&G states that wolf control may increase densities and recruitment, but given the state of the habitat, it may be at the expense of productivity. Finally, on page 8 of the FA, ADF&G states that conducting aerial wolf control on "small disconnected areas may not be effective at raising the moose

population near minimum IM objectives” but may result in “modest increases in the moose population in the short term.”

In order to downplay the limitations of habitat, the FA states that “reallocating mortality from wolf control directly to harvest will help prevent a reduction of nutrition and productivity.” Section 3C of the FA states that reducing predation “will allow for *possible* reallocation of moose from predators to harvest; the program will initially focus on wolves due to *potential* effectiveness of aerial wolf control.”

While the logic presented in the FA regarding controlling wolves to benefit moose populations is difficult to follow, we agree with ADF&G that increasing the moose population absent adequate habitat is ill-advised. We disagree, however, with the highly theoretical “reallocation” premise for several reasons. Firstly, if wolf control were successful, the moose population would need to increase at least temporarily in order for calves to grow to a harvestable age. Thus there would be at least a temporary increase in pressure on already degraded habitat. Secondly, research has shown that wolves and humans do not target the same class of ungulates. Where humans target primarily robust adult ungulates, wolves primarily predate on the young or individuals that are otherwise disabled or weak (Boertje 2009). 3.) Finally, a true reallocation would be dependent upon hunters and wolves encountering the same moose. This is highly unlikely considering the limited scope of the program and the fact that hunters are not necessarily utilizing the same areas where wolf control would be conducted. We would also like to note that no literature is cited regarding the theory of reallocating moose from predators to humans.

Not only do we have concerns over the reallocation premise, we continue to question the efficacy of the proposed program and the validity of ADF&G’s arguments for how success would be achieved. According to the agency, the success of this program is in part dependent upon a “sufficient number of wolves being removed.” However, even if wolves instead of habitat were the limiting factor, land ownership patterns, difficulty of legal access, and difficult terrain make it doubtful that a sufficient number of wolves could be removed to meet the program goals. Indeed, the FA outlines the disjunct nature of the proposed control areas and describes the negative consequences this would have on the potential success of the program. We direct the BOG to our comments submitted in December 2011 for arguments relating to the feasibility of the program and how it relates to the IM statute.

In addition to the program not meeting the requirements for feasibility under the IM statute, we would also like to draw attention to the fact that habitat, rather than predation, has been identified as the primary limiting factor for moose in 15A, thereby precluding public participation in aerial wolf control under 5AAC92.039.

According to AS 16.05.783 (a) generally, a member of the public may not shoot or assist in shooting a wolf from an aircraft or on the same day that the person has been airborne. However, the Board may authorize airborne or same day airborne shooting if

1. game prey population under AS 16.05.255(g) that objectives set by the board for the population have not been achieved and that *predation is an important cause for the failure to achieve the objectives* set by the board, and that a *reduction of predation can reasonably be expected to aid in the achievement of the objectives*; <sup>1</sup>

Therefore, this proposal may not rely on aerial or same-day shooting by the public as habitat, not predation, is the primary cause of the failure to achieve population objectives and reducing predation cannot be reasonably expected to aid in the achievement of objectives.

Besides the numerous concerns we have with the premises behind the programs potential success as well as the legality of program implementation, we are also concerned over the difficulty with which the results of this program could be monitored and interpreted. Section 1(C) (iii) outlines numerous challenges to adequately monitoring wildlife populations and assessing whether any potential improvement in the population or harvest is the result of wolf control or some other factor. Section 2(h) states that the potential to document *reasons* for success or failure in population recovery or harvest is low. Finally, section V (a), V (b), V (c) of the FA all refer to the difficulty with which the treatment effects of predator removal will be confounded.

As we have stated in numerous sets of comments over the years to the BOG, a lack of monitoring is a serious flaw in any program; this is especially true of controversial wildlife management actions such as predator control. We believe that instituting yet another program that cannot be adequately monitored or interpreted is not consistent with sound wildlife management.

Another concern raised by the FA is the cost of implementing this program. According to the FA, the expected harvest increase is "less than 50 moose/year." However, considering the theoretical nature of reallocation as well as the uncertainty associated with the proposed road hunts, we question how ADF&G arrived at this number. Because no models are provided we find the figure to be arbitrary and highly speculative. However, using ADF&G's estimated harvest increase of 50 moose and using an estimated cost of \$100,000/year for aerial control alone, we calculate the cost per moose harvested would be \$400. If total program costs of \$700,000 are considered, over the life of the program an estimated cost of \$2,800 per moose would be incurred. If, as ADF&G expects, the harvest increases "less than" 50 animals, the cost per moose will rise. This is hardly the cost

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<sup>1</sup> *Id.* A member of the public must obtain a permit from ADF&G to conduct aerial or same day airborne shooting. 5 AAC 92.039. ADF&G may issue such permits to the public if the board authorizes public aerial shooting as part of an IM program and when the requirements of AS 16.05.783(a) are met. See 5 AAC 92.110(f).

effective type of program envisioned when the National Resource Commission released their review of Alaska's predator management programs in 1996.

In addition to the numerous problems identified with the FA we question how a harvest strategy which focuses on road corridors might be employed; there are likely numerous limitations of such a strategy which were not identified in the document. First, can such a strategy be safely employed in such a popular recreational destination? Second, since females with calves are the ones primarily killed in vehicle collisions, and these are the most productive portion of the population, would the strategy focus on harvesting this age class? What effect would that have on the moose population as a whole? Finally, moose along the roadway are a valuable resource for viewing wildlife. In the past, the BOG has limited hunting in such areas as along the Skilak Lake loop in order to allow for this use. Are we to assume that under this program moose are now to be "reallocated" from wildlife viewers to hunters?

The final concern we would like to address is the public reaction to aerial wolf control. Section B (j) of the FA describes anticipation of public reaction to the management tool. Interestingly, the tool for which public reaction is described is fire and although potential conflict over wildlife is identified, it refers solely to conflict between hunter groups. Further the FA states that Advisory Committees are generally supportive of predator control but fails to mention that this is not true of this particular program; several committees voted against proposal 35.

ADF&G is well aware that the primary management action before the BOG is aerial wolf control, not fire management. Considering there are countless members of the public who live and recreate on the Kenai, it is shortsighted to forgo an analysis of anticipated reaction to such a tool. In our view, if aerial wolf control moves forward on the Kenai, public reaction will be severe. An indication of this reaction has been clearly demonstrated by recent press on this issue. As well, the BOG received over 260 comments against proposals 35 and 36 for the November meeting while receiving only 8-10 comments in support of these proposals.

### Comments Specific to Proposal 36

As with 15A, Defenders believes that adopting aerial wolf control is the wrong approach for the following reasons. 1) A low bull: cow ratio, rather than predation, has been identified by ADF&G as the primary limiting factor and harvest restrictions are expected to be temporary. 2) Defenders seriously questions the theoretical reallocation from wolves to humans is possible in this unit (see supplemental comments on proposal 35). 3) As with the program for 15A, an IM program for Unit 15C would come at an estimated cost of \$700,000; \$100,000 for aerial control alone. Though the FA does not provide an estimate for how many moose are expected to result from this program, we do not believe the program would be cost effective if numbers are comparable to those expected in 15A 4). Because predation is not the primary limiting factor, the BOG cannot approve public

participation in aerial wolf control under AS 16.05.783 (a) further decreasing the cost effectiveness of the program. 5) Public sentiment against this issue is strong but has been discounted by both the BOG and ADF&G.

While these issues are not insignificant, we have sufficiently addressed them above and in previous comments so we will not repeat our concerns here. However, several concerns were raised by the FA for this proposal that merit outlining below, the primary concern being the numerous unsupported assumptions made in the document.

The main example of an unsupported claim is found on page 2 of the FA for proposal 36 which states that "The Department hopes that the antler restrictions will allow the bull: cow ratio to increase back to objective levels in most areas within 2 regulatory years." The FA goes on to state that it "is possible that minimum IM harvest objectives may again be met in 2013 without any IM action" and that there has been a "great deal of internal discussion of the temporary nature of the restrictions and how this relates to 5AAC 92.106 (5) (B)."

However, in an apparent attempt to discount 5AAC 92.106 (5)(B), the FA continues that "unless calf recruitment is improved substantially, even minimum IM harvest objectives may not be sustainable regardless of the harvest strategy that is adopted following the current restrictions." Evidence meant to provide support for this claim is provided on page 3 where ADF&G states that limited data suggest that "recent moose calf numbers are at levels that would at best maintain or result in slowly declining population levels" and that calf: cow ratios in the Caribou Hills (CH) have ranged from 5 to 18 calves per 100 cows over the last five years. We strongly question the completeness of this data as well as the assertion that the current conditions point to a potential decline in the population absent models demonstrating how such a decline might occur.

While true that historically the CH and the Homer Bench (data not included in the FA) have been used to determine moose population compositions, biologists have long questioned whether the CH is representative of the unit due to a variety of factors. One problem in relying on data from the CH is the timing of surveys. For example, if moose surveys in the count area occur too long after the first snowfall moose tend to migrate to other areas. This is especially true of cows with calves which tend to disperse sooner than bulls. This results in a typically low calf: cow and high bull: cow ratio for the CH count area. In fact, had ADF&G relied solely on data from the CH to estimate bull: cow ratios, the decline in bull: cow ratios which resulted in the recent change in bull moose harvest strategy would not have been recognized.

Because of the limitations of relying on the CH and Homer Bench data alone, the counts have been expanded since 2007 to include count areas 20 and 24. With these two new areas included the 2010 calf cow ratio was 19: 100 and the 2011 ratio was 21: 100. Furthermore, if the Homer Bench counts conducted in November of 2011 are included, the ratio rises to 26: 100 which should be adequate to maintain moose population growth. We argue that

the full suite of survey data offers a more accurate picture of the current composition and is necessary to make assumptions regarding the future of this population.

The FA's population estimate offers further support that the population is not under threat from wolf predation. ADF&G estimates a moose population of 2919 moose and a wolf population of between 44-52 animals. Using a median wolf estimate of 48 wolves, the wolf: moose ratio would be estimated at 1 wolf per 60 moose. Biologists agree this should be adequate to prevent wolf predation from limiting the population. According to Gasaway et al. (1983), at a ratio of more than 30 moose per wolf the moose population would likely either remain stable or increase in the presence of adequate habitat and if winter conditions were not severe (see also Keith 1983).

These ratios are utilized by both ADF&G and BOG to indicate whether predator control is warranted in a given area. In fact, various iterations of the BOG's wolf management policy including the 1982 policy as well as the draft policy for 2010, indicated the BOG's belief that if there are "50-100 moose per wolf, the moose population will increase unless or until a very serious mortality factor, such as a very severe winter takes effect." The BOG's wolf policy cites Boertje et al. (2009), who demonstrated that, a moose: wolf ratio of 54:1 during early winter in Unit 20A resulted in a low predation rate and an increasing moose population.

Not only are claims over low calf numbers unsupported, the FA makes several assumptions over calf mortality that we find specious. In fact, ADF&G has not completed studies demonstrating high calf mortality. In Appendix 3 ADF&G states that a young survival estimate with mortality causes have not been identified, nor has an estimate of parturition rate been completed. Studies to examine pregnancy rates, age distribution, and mortality rates are planned for spring of this year; it is therefore premature to make assumptions on mortality and population growth or decline.

As with proposal 35, proposal 36 will also face challenges regarding monitoring and interpretation of results. However, the FA claims that the problem potentially lies in a skewed age structure, an unsupported claim. Section 2 (h) of the FA for 15C argues that it may be difficult to distinguish benefits of the program in part because the relatively low calf recruitment may have resulted in an increased (older) age structure of cow moose. Again, the document fails to provide any evidence to support this assertion. As we have previously outlined, contrary to the claims of the FA, 15C has enjoyed relatively good recruitment for numerous years. Furthermore, habitat is adequate in this unit and winters have not been severe; therefore, there is no reason to expect a skewed age structure.

As an advocacy organization, Defenders feels compelled to point out that the FA for proposal 36 fails to adequately evaluate the public reaction to aerial wolf control. Indeed it is evident that both ADF&G and the BOG have discounted the negative reaction this proposal has already invoked. Even though only a handful of comments were received in support of wolf control, members of the BOG put on the record in Barrow that they had

repeatedly heard that something must be done for moose on the Kenai. BOG members failed to mention the opposition to aerial wolf control demonstrated in the media and from the 260+ comments received by the BOG opposing aerial wolf control. There was also apparently no mention of the local Advisory Councils – most notably the one from Homer around which this program would focus – voting against these two proposals (HomerNews.com 11-2-11).

In conclusion, Defenders and our members and supporters believe that the FAs as written fail to prove assumptions relating to moose population growth and mortality and the need for aerial wolf control on the Kenai Peninsula. We also remain deeply concerned that ADF&G and the BOG have discounted the negative reaction to proposals 35 and 36 and that the BOG members failed to take into account the opposition to aerial wolf control demonstrated in the media and through the 260+ comments received by the BOG opposing aerial wolf control. We look forward to testifying at the January meeting and to monitoring the discussion on proposals 35 and 36 and the FA.

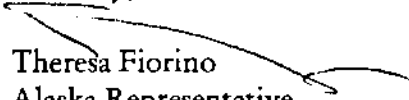
#### *Addendum*

The Operational Plans for 15A and C were released too late to properly incorporate a response into this letter. However, we would like to address one critical issue raised by the plan for 15C. Part three of the Adaptive Management Framework states that ADF&G “may attempt to capture and radio collar several wolves from identified packs” and that “having wolves radio collared in a particular pack can expedite eliminating the pack when the pack leaves protected land and moves onto land available for aerial take.”

Defenders has argued in previous comments that Intensive Management is not compatible with the purposes of the Kenai Refuge, the mission of the National Wildlife Refuge System, nor federal laws and policies which govern refuge management. If refuge wolves were to be specifically targeted, this would amount to an infringement on the federal mandates of the refuge. We adamantly oppose ADF&G’s intent to purposefully target refuge wolves in 15C.

Thank you for considering our additional comments.

Sincerely,

  
Theresa Fiorino  
Alaska Representative  
Defenders of Wildlife

Citations:

Alaska Board of Game. 1982. Policy #82-31-BG. Alaska Wildlife Management Plans. Species Management Policies. Wolf Management Policy.



Boertje, R.D., Keech M.A., Young D.D., Kellie K.A., and C.T. Seaton. 2009. Managing for elevated yields of moose in Alaska. *Journal of Wildlife Management* 73 (3):314-327.

Gasaway W.C., Stephenson R.O., Davis J.L., Shepherd, P.E.K., and O.E. Burris. 1983. Interrelationships of Wolves, Prey and Man in Interior Alaska. *Wildlife Monographs* No. 84 1-50.

Keith, L.B. 1983. Population dynamics of wolves. Pp. 66-77 in L.N. Carbyn, ed. *Wolves in Canada and Alaska: Their status, biology and management*. Rep. Ser. 45. Can. Wild. Serv., Ottawa.

HomerNews.com. [Homer Advisory Committee votes against wolf control 11/02/11](#)