



Alaska Wildlife Alliance

Position paper on Intensive Management and other efforts to reduce predator populations

Introduction

The mission of the Alaska Wildlife Alliance is to protect Alaska’s wildlife for its intrinsic value, as well as for the benefit of present and future generations. We advocate for healthy ecosystems that are ethically and scientifically managed. Here, we review the evolution of Intensive Management in Alaska, state our position, and recommend actions that support our mission.

Background

In 1994, the Alaska State Legislature authorized Senate Bill 77, “An Act Relating to the Powers of the Board of Game [BOG] and to Intensive Management of Big Game to Achieve Higher Sustained Yield for Human Harvest.” This Intensive Management (IM) law is now found in Alaska Statute 16.05.255 (e)-(g) and (k) with the implementing regulations for predator control programs in Alaska Administrative Code 5 AAC 92.106, 108, 110-113, 115-116, 118, 121-124 and 127 (formerly all under 5 AAC 92.125).¹ The IM law and regulations require the state to implement actions authorized by the BOG, specifically habitat enhancement, harvest regulatory changes and predator control, to increase harvestable numbers of caribou, moose, and Sitka black-tailed deer in areas important for providing “high levels of human consumptive use.” Population and harvest objectives are determined by the BOG under 5 AAC 92.108.

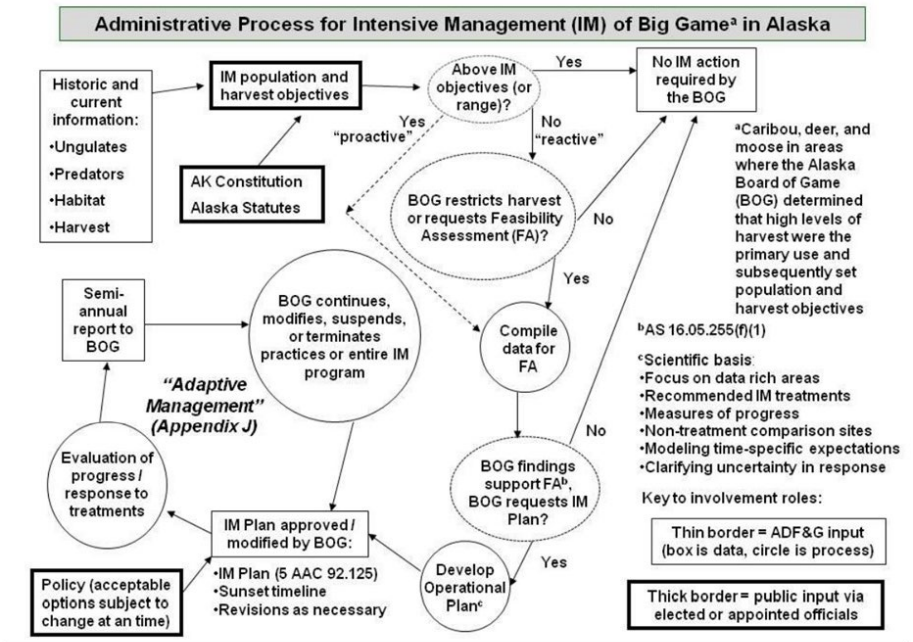
Although predator control is only one of several tools to implement IM, it is the most controversial from societal and scientific perspectives. Furthermore, because the BOG and Alaska Department of Fish & Game (ADF&G) lack authority to regulate prescribed fire, manage natural fire regimes, or implement other habitat improvements on lands other than state Game Refuges and the Delta Bison Range, control of large predators (brown bears, black bears, wolves, coyotes) becomes the default mechanism for implementing IM when there are insufficient numbers of caribou, moose, and Sitka black-tailed deer available to meet hunter demand.^{1,6} Predator control under IM occurs only in designated Predator Control Areas. For other prey species harvested by hunters (e.g., muskox) or in other areas, the ADF&G Commissioner may authorize predation control to recover depleted prey populations under Alaska Statute 16.05.020(2) and the BOG may adopt regulations for similar purpose under AS 16.05.255(a)(6).³ A third form of predator control occurs when hunting and trapping harvest regulations for predators are liberalized by the BOG to the point that it becomes predator control in all but name, but lacks the scrutiny provided by IM policy.

Responding to a request by then Governor Tony Knowles in 1995, the National Research Council commissioned a blue-ribbon panel of scientists to undertake a scientific and economic review of management of wolves and bears in Alaska. The report, published in 1997, reached 17 conclusions and associated recommendations, most of which urged that predator management efforts have a more cautious, research-based, conservative, experimental, and adaptive approach that included public involvement and economic evaluations.⁸

In 2011, the ADF&G published protocols for implementing IM.² This document outlines the relationships between BOG, ADF&G, and the public in implementing IM, and identifies five guiding principles and three documents that must be generated sequentially by ADF&G during the BOG process: feasibility assessment, operational plan, and department report (see figure). The feasibility assessment is prepared by ADF&G from available information at the request of the BOG. The operational plan, prepared by ADF&G, “describes scientific criteria of treatment strategies and the decision framework” for the IM program. The department report is a legally-mandated annual report to the BOG for any IM program that includes predator control.

In 2013, the Alaska Chapter of The Wildlife Society adopted their position statement on IM.¹ This multiagency group of wildlife professionals concluded that while the IM protocol is a positive advance in implementing IM, there are still several outstanding concerns including (1) the authority of ADF&G Advisory Committees to revoke cow and calf moose hunts in their geographic areas (which can skew bull:cow ratios and/or give the appearance of reduced populations for harvest); (2) that achieving IM objectives may require removing more predators or more predator species than is possible in some programs, especially where predator reduction is primarily based on public participation; (3) some ungulate population objectives may be unattainable due to habitat limitations or other environmental factors; (4) the operational costs for IM are high, requiring as much as a third of the operations and salary budget of the Division of Wildlife Conservation in some regions; (5) IM programs are not usually intended as research into predator-prey dynamics, which would require designed experiments with explicit controls; and (6) the efficacy of IM programs are difficult to assess when they deviate from a structured decision framework in response to public demand for increased efficacy or participation.

Currently, 97% of Alaska is deemed appropriate for IM (5 AAC 92.108).³ As of this date, IM programs are active in Game Management Units (GMU) 9B, 13, 17B, 17C, 19A, 19b and 19D; they are inactive in GMUs 9C, 9E, 12, 20B, 20D, 20E, 25C, 15C, 16 and 21E; and they have expired in GMUs 1A, 3, 9D, 15A, 20A, 20D and 24B. As defined in 5 AAC 92.116(c), "active" means that predator control permits have been issued during the current year. Other areas with predator “reduction” outside IM programs include GMU 10 (Unimak) and Unit 26B (muskox).³



At any one time, predator control under these programs encompassed 5–11% of Alaska’s land area. All programs included efforts to reduce wolf populations and three programs attempted to also reduce bear populations. In designated Predator Control Areas, methods include agency shooting of bears and wolves from

helicopters, snaring of bears, shooting female brown bears accompanied by cubs, land and aerial hunting of wolves by the public, and carbon monoxide poisoning of wolf pups in dens.¹⁰

In more recent years, predator control has increasingly occurred outside Predator Control Areas (designated as part of IM programs) through the liberalization of recreational harvest regulations.^{6,7,10} The BOG has modified regulations that govern the hunting and trapping of bears, wolves and coyotes with the intent of reducing their populations. Furthermore, the Federal Subsistence Board has adopted these liberalized seasons, methods, and quotas. However, these regulatory amendments are not subjected to feasibility assessments, statement of objectives, or monitoring of outcomes to the degree prescribed by the ADF&G IM protocols. From 1980 through 2011 brown bear hunting regulations were liberalized to reduce brown bear abundance by extending hunting seasons, eliminating tag fees for resident hunters, and changing bag limits from 1 bear per 4 years to 1 bear per year.⁶ By 2010, the capacity to further liberalize hunting regulations in these ways was largely exhausted and, as of 2017, the last remaining Predator Control Area for bears was eliminated by BOG. However, brown bear hunting regulations have been relaxed in new and unprecedented ways, such as allowing brown bears to be shot over bait, allowing hunters to sell the hides and skulls of harvested brown bears, and changing bag limits to 2 bears per year.³ Black bear and wolf hunting regulations have been similarly liberalized, including expanded bag limits and extending the hunting season into times of the year when hides have little value as furs.¹⁰ A particularly egregious and recent example is the relaxed harvest cap authorized by the BOG during the 2019-2020 trapping season that resulted in as many Alexander Archipelago wolves being harvested as were estimated to reside on Prince of Wales Island.

Lastly, the BOG and ADF&G have made a deliberate effort to extend the reach of liberalized harvest regulations for large carnivores onto federally-managed lands.^{7,10} Until recently, most federal lands in Alaska were largely exempt from most of these efforts to control predators based on previous interpretations of the 1980 Alaska National Interest Lands Conservation Act, the 1964 Wilderness Act and other legislation. Regulation (5 AAC 92.110, 5 AAC 92.115) specifically states that any activity involving wolf or bear population reduction population regulation program potentially involving federal lands will not apply to lands managed and administered by the National Park Service or U.S. Fish and Wildlife Service unless approved by the applicable agency.

In 2015, the National Park Service in Alaska pushed back against some of the most extreme of the state's predator-reduction regulations by prohibiting the following sport hunting and trapping methods on National Preserves: taking any black bear, including cubs and sows with cubs, with artificial light at den sites; harvesting brown bears over bait; taking wolves and coyotes (including pups) during the denning season; taking swimming caribou; taking caribou from motorboats under power; taking black bears over bait; and, using dogs to hunt black bears. In 2016, the U.S. Fish and Wildlife Service followed suit by prohibiting predator control on National Wildlife Refuges in Alaska including taking black or brown bear cubs or sows with cubs; taking brown bears over bait; taking bears using traps or snares; taking wolves and coyotes during the denning season; and taking bears from an aircraft or on the same day as air travel has occurred. However, under the Trump administration, the U.S. Fish and Wildlife Service rule was overturned in 2017 through the Congressional Review Act, and the National Park Service rule was overturned in 2020 after a Secretarial Order by then-Secretary of the Interior Ryan Zinke. Both actions make it difficult for National Preserves and National Wildlife Refuges, which encompass 100 million acres in Alaska, to be managed in accordance with broader national and ecological interests such as conserving natural diversity.^{11,12}

Findings

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.⁹ 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:

- We are concerned that some methods (e.g., snaring of bears and wolves, “denning” of wolf pups) used in Predator Control Areas continue to be inhumane.
- 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.¹
- 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 the BOG is disingenuously stepping 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, and by working with the State of Alaska to extend these regulations onto National Preserves and National Wildlife Refuges.
- 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 bear 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 the BOG only represents, at most, the interests of ~25% of Alaskans who hunt but is promoting practices such as predator control and liberalized harvest that have ecological and economic outcomes that affect all Alaskans.
- 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.

Recommendations

- (1) AWA will work to ensure that methods of predator control are humane and undertaken only by ADF&G professionals.
- (2) AWA will review Intensive Management proposals to the Board of Game to ensure that ungulate population and harvest objectives are reasonable, that the duration and geographic scale of proposed IM is consistent with the population objective, that ADF&G's 2011 protocols are followed, and that all alternative means of enhancing ungulate populations are first considered before invoking predator control.
- (3) AWA will critique proposed changes to hunting and trapping regulations for the recreational harvest of large carnivores from the perspective that these may be thinly disguised predator control actions.
- (4) AWA will promote interagency collaboration to create better fire and forest management policies for the benefit of wildlife.
- (5) AWA will promote programs and projects that reduce human-caused non-hunting mortality of caribou, moose, and Sitka black-tailed deer in order to optimize legal recreational and subsistence harvest opportunities.
- (6) AWA will promote programs, projects, and policies that encourage human-wildlife coexistence.
- (7) AWA will work to ensure that federal agencies can manage wildlife on federal lands for purposes that are consistent with national legislation.
- (8) AWA will work with legislators to amend the 1994 Intensive Management statute to be permissive ("may") rather than mandatory ("shall"). In addition, AWA will work to amend IM regulations to consider the effects of a changing climate on population goals and harvest objectives.

References

- 1) Alaska Chapter of the Wildlife Society. 2013. Position statement intensive management of big game in Alaska (adopted June 2013). http://wildlife.org/wp-content/uploads/2015/12/Position-Statement-IM_Big_Game_in_Alaska_Adopted.pdf. 4 pp.
- 2) Alaska Department of Fish and Game. 2011. Intensive management protocol. Division of Wildlife Conservation, Juneau, AK. http://www.adfg.alaska.gov/static/research/programs/intensivemanagement/pdfs/intensive_management_protocol.pdf. 37+ pp.
- 3) Alaska Department of Fish and Game. 2020. Intensive management in Alaska; Alaska's predator control programs. <http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.programs>.
- 4) Boertje, R. D., C. L. Gardner, M. M. Ellis, T. W. Bentzen and J. A. Gross. 2017. Demography of an increasing caribou herd with restricted wolf control. *Journal of Wildlife Management* 81:429–448. doi:[10.1002/jwmg.21209](https://doi.org/10.1002/jwmg.21209).
- 5) Leopold, A. 1966. *A Sand County Almanac*. Oxford University Press, NY. 269 pp.
- 6) Miller, S. D., J. W. Schoen, J. Faro and D. R. Klein. 2011. Trends in intensive management of Alaska's grizzly bears, 1980–2010. *Journal of Wildlife Management* 75:1243–1252.
- 7) Miller, S. D., J. W. Schoen and C. C. Schwartz. 2017. Trends in brown bear reduction efforts in Alaska, 1980–2017. *Ursus* 28(2):135–149. <https://doi.org/10.2192/URSU-D-17-00002.1>.
- 8) National Research Council. 1997. *Wolves, bears, and their prey in Alaska: Biological and social challenges in wildlife management*. National Academy Press, Wash., DC. 207 pp.
- 9) Regelin, W. L., P. Valkenburg and R. D. Boertje. 2005. Management of large predators in Alaska. *Wildlife Biology in Practice* 1(1):77–85. DOI: 10.2461/wbp.2005.1.10.
- 10) Ripple, W. J., S. D. Miller, J. W. Schoen and S. P. Rabinowitch. 2019. Large carnivores under assault in Alaska. *PLoS Biol* 17(1): e3000090. <https://doi.org/10.1371/journal.pbio.3000090>.
- 11) Joly, J. L. 2010. National Wildlife Refuges and Intensive Management in Alaska: Another case for preemption. *Alaska Law Review* 27:27–48. Available at: <https://scholarship.law.duke.edu/alr/vol27/iss1/2>.
- 12) Joly, J. L. 2017. Alaska: Extraordinary parks, extraordinarily complicated. *Akron Law Review* 50(1):111–125. Available at: <http://ideaexchange.uakron.edu/akronlawreview/vol50/iss1/4>.

From: [Nicole Schmitt](#)
To: [Rep. Bart LeBon](#); [Rep. Adam Wool](#); [Rep. Bryce Edgmon](#); [Rep. Sara Rasmussen](#); [Rep. Andy Josephson](#); [Rep. Steve Thompson](#); [Rep. Ben Carpenter](#); [Rep. DeLena Johnson](#); [Rep. Kelly Merrick](#); [Rep. Neal Foster](#); [Rep. Daniel Ortiz](#)
Subject: Alaska Wildlife Alliance comment to oppose SB22
Date: Tuesday, April 13, 2021 1:28:26 PM
Attachments: [image001.png](#)
[AWA+position+paper_intensive+management_31DEC2020.pdf](#)

Dear members of the House Finance committee,

My name is Nicole Schmitt, I am the Executive Director of Alaska Wildlife Alliance. Our organization was founded in 1978 to ensure the scientific and ethical management of Alaska's wildlife. I submit the following testimony on behalf of our 600+ members across Alaska, urging the committee to *reject* SB22 to sunset the Intensive Management (IM) surcharge.

Essentially, this surcharge is a tax on all Alaskan hunters (myself and hundreds of our members included). For such a tax to be levied in perpetuity, we believe the funds must be appropriated where they are needed most for wildlife management. In a State where we have not even made our match to receive all qualified Pittman Robertson funds, an at nausea surcharge to ensure IM – which is not essential to sustained yield – is perplexing.

Concerns about the application of IM in Alaska

We acknowledge that IM 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.

However, we have serious concerns about the application of the Intensive Management (IM) program, which must be addressed before a surcharge sunset clause is revoked, including:

- The economic costs of sustained predator control at landscape scales are generally so high that sustained yield becomes a euphemism for subsidized yield. I.e, the need for managers to apply predator control is antithetical to scientifically-accepted definitions of “sustained” yield (if it requires millions of dollars in sustained human intervention, how does that qualify as sustainable for “sustained” yield?);
- ADF&G and the Board of Game 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.” This leads to a moving target without any rubric for when or if IM is successful. **With a surcharge sunset, at least, we have some mechanism to question these programs for their efficacy and attribute precious funding to programs that work if IM does not;**
- The Board of Game only represents, at most, the interests of ~25% of Alaskans who hunt, but is promoting practices such as predator control and liberalized harvest that

have ecological and economic outcomes that affect all Alaskans. **If the sunset clause is revoked, the legislature forfeits its ability to add checks and balances to this process, which may impact Alaskans in the wildlife watching industry.**

- Some methods (e.g., snaring of bears and wolves, gasing denned of wolf pups) used in Predator Control Areas continue to be inhumane and serve as a black-eye for Alaska's image as a wildlife-centered tourist destination;
- IM population and harvest objectives have not been reassessed since their inception. Alaska is experiencing dramatic landscape changes and before IM objectives can be responsibly acted on, they must be updated to reflect the reality our wildlife species see today;

Our Recommendation:

We urge committee members to keep the sunset clause in place to ensure that 1) the legislature conducts a regular check on the Intensive Management program for the above-listed concerns, and 2) that Alaskan hunters are not taxed for a program that is not essential to their opportunities.

Thank for considering this testimony. I have attached Alaska Wildlife Alliance's position paper on Intensive Management for more information and citations for the above claims.

Kindly,

Nicole Schmitt

Executive Director
907-917-WILD (9453)
www.akwildlife.org
EIN: 92-0073877

