

Overview

McGrath

Wildlife

Mgmt.

**Joint Senate and House Resources Committee  
Briefing: McGrath Wildlife Management  
Expected Witnesses**

1. Mike Fleagle - Chief, McGrath Tribal Council (*teleconferenced*)
2. Toby Boudreau - Biologist, ADF&G (*teleconferenced*)
3. Donne Fleagle – Overview (5 Min)
4. Dick Newton – Takotna, “this is what’s happening on the ground”
5. Regional Testimonies
  - AHTNA – Fred John
  - Tanana Chiefs Conference - Stanley Ned
  - Bristol Bay Native Assn. - Myra Olsen & Joe Clark
6. Agencies
  - Abundant Wildlife Coalition - Ted Angasan
  - Alaska Outdoor Council - Dick Bishop
  - Coalition for Alaskan Way of Life - Gabe Sam (*teleconferenced*)
  - Alaska Trappers Association - Pete Buist (*teleconferenced*)
  - Caribou Protection Program - Joe Mattie (*teleconferenced*)
  - Alaska Wildlife Conservation Assn. - Bill Hagar (*teleconferenced*)
7. Huslia - Darrel Vent  
Fort Yukon - Jonothon Soloman  
Kipnuk - Carl Jack

# Statewide Rural Summit

VOLUME 1, ISSUE 11

FEBRUARY 2000

## February 1 & 2, 2000, McGrath Hosts Statewide Meeting on Intensive/Active Wildlife Management

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The Goal of this meeting is to bring rural Alaskans together in rural Alaska to discuss and arrive at strategies/remedies to use in addressing the declining moose population and its primary predator THE WOLF that threatens our villagers abilities to eat our traditional annual meat. Looming on the horizon is state regulations that will trigger a Tier II permit hunt here in McGrath which will put locals in competitive permit systems

with other non-local but historical users. Not everyone will share in the annual activity that has been a family seasonal benchmark. This is unacceptable to McGrath residents who are no strangers to pointing to this decline in our GMU and requesting some type of State intervention. McGrath Residents are no strangers to seeing nothing happen, which has given rise to ex-



Rural Decisions by Rural Alaskans.

treme frustration and anger towards the State Department of Fish and Game and loss of respect and faith in the Governor. Many are angry. It's been 3 years since the Governor met with the area. No ballot initiative was law

Cont'd Page 2

## Predator Control Programs

The State can implement a Predator Control Program. Our Game Management Unit has a Wolf Predation Control Implementation Plan on the

books under 5AAC.92.125(1) that has been in regulation since Oct. 1995. The Board of Game has passed regulations to address our cries, how-

ever the Governor and his Fish and Game Commissioner, Frank Rue, have stated publicly that they do not support the archaic

Cont'd page 2

### Special points of Interest:

- Hosted by the McGrath Native Village Council
- Donne Fleagle hired to plan and implement meeting
- Partnerships with Rural Cap, Takotna Community Association, TCC, MTNT, Ltd., Iditarod Area School District and Pen Air
- Contributors: Nikolai, Takotna, Telida Tribal Councils
- Community Participants and McGrath City Council Members
- Housing needs contact TCC 524-3005 or MNVC at 524-3024
- February 1 & 2, 2000
- McGrath School Commons
- Potluck February 1, 2000 @ 7 pm McGrath School Commons
- Chinese Auction at Local Tavern evening of February 1

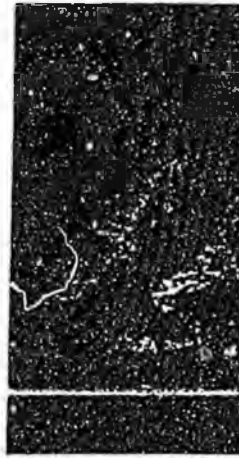
## Programs cont'd.

inhumane methods used in the past to manage predator populations (wolves). In 1999, the Governor said, "We have come a long way since the disgraceful and indiscriminate wolf killings of 1994, which were done in the name of predator control." Commissioner Rue said, "The Board of Game and the Commissioner retain

control in deciding when to implement this type of predator control...." The Board of Game has heard our testimony in the past and has passed regulations that are on the books for a predator control program, thus it would seem the higher branch of Gov-

ernment is failing to do its job because of the ballot initiative in 1996 which did away with

same day airborne hunting, and I quote Com. Rue and Knowles, "the standard strongly supported by the public."



"Wolves have been spotted within the city limits..." Mayor Ursal said in a letter to the Gov.

*"There are wolves all over the place! The wolves have gotten so numerous that they have killed and eaten a dozen pet dogs in the village of Chuathbaluk, ten miles upriver from Aniak. All the owners could find is the dog's chain or maybe just the dog's tail or a few entrails."*

*Herman Morgan, Chairman, Central Kuskokwim Fish & Game Advisory Committee in a letter to State officials.*

## Feb. 1 cont'd.

then. A predator control program passed by the State Board of Game was on the books. The Governor stood before all of us and said, "Let's put something in place that's lasting, so we don't go through this every two years." His

National Academy of Science Study was what he pointed to. It's done. What has been put in place is a steady decline in the moose population, and biologically sound aggressive scientific management has been eroded.

A system that manages people and NOT animals. What has developed is a "non-interventionist philosophy of resource management", and the ADF&G leadership has embraced this.

*"The initiative process is not the place to decide wildlife management issues.*

*These decisions should be left to the managers who have been given the responsibility of caring for our resources." Mike Fleagle, McGrath 1998 Letter to the ADN*

## Predator Control Program for McGrath Updated

The McGrath Native Village Council sent an emergency petition to the Alaska Board of Game, which was heard at the January statewide issues meet-



The key to success is realizing our POWER as CHANGE agents

ing in Anchorage. In it, we requested immediate wolf control for our area. Board member Mike

Fleagle, was ruled to be in conflict, as he au-

thored the petition, and was not allowed to participate in the deliberations. Both he and Donne took the opportunity to testify before the board, and gave a good report of our cur-

rent situation. The

*"We should try extremely hard to keep the questioned wording "biological emergency" in any wolf-moose controversy allowing the problem of empty freezers to be settled biologically rather than politically."*

*Vera Goods, 2nd Chief, Takotna Village Council and Dick Newton, Chairman, Takotna Community Association wrote*

## Updated cont'd.

board accepted the petition, and declared an emergency. They then updated the old intensive management plan for 19(D) East with current information, and added a section that would allow the commissioner to issue airborne shooting or land-and-shoot permits to members of the public, a practice that would now be allowed under SB-74. The board did an excellent job of addressing the issue, and as one member said, (paraphrased) "If we don't pass this and start to manage predators and prey, we might as well go home."

## HISTORY

1995—Board of Game Wolf Predation Control Implementation Plan on the books under 5AAC.92.125 (1).

1996—Area meets with the Governor and begs for help. Governor does not implement BOG plan and does nothing.

1996—Ballot Initiative banning same day air-

## BROAD PUBLIC SUPPORT

The Governor, the Commissioner of Fish and Game, the Deputy Commissioner and several other high level Administration folks were invited. The Administration has declined the invitation. The basis is

"while we mean no disrespect to the people of McGrath or the Tribal Council, we are not "ready" to discuss implementation of a predator control program in the McGrath area" and regardless of the Board of Game action, The Knowles Administration is now stipulating that there must be public support in Alaska before they can commit to a predator control program. So, WE, the people are right back

borne passes in fall elections

1998—Snaring Initiative fails at fall elections

1999—SB 74 Same Day Airborne vetoed and the veto overridden. Becomes law.

1999—Wolves eat local dogs and are spotted in down town areas. News articles in State papers.

where WE started. State Citizens, state resources, working within a state process that is broken.



"We choose to protect the Moose." Mayor Ursel wrote

Interestingly, the 3 criteria that Governor Knowles has quoted as being necessary for any program to start came from the pages of the National Academy of Sciences report.

The 3 criteria are

1. Sound Science,
2. Cost Effectiveness,
3. Broad Public Support.

In the NAS report, they state that Alaskans are likely to support predator control where the resource is largely used as a subsistence source of food.

1999—McGrath Tribal Council submits Petition to Board of Game for a wolf control program with letters of support from tribal councils and City of McGrath. Area meeting held.

2000—State Board of Game Reauthorizes Wolf Predation Control Implementation Plan

2000—Rural Summit held in McGrath.

*"People remember what it's like when the old-time wolf hunters were out there and how many moose they had, he (Toby Boudreau, local F&G McGrath Biologist) said. That's all they want. They don't want all the wolves to go away; they just want enough moose to eat."*

*FDN-M Dec. 1999*

*Article*

*"They (State) are responsible, by our state constitution, as keepers and managers of the states natural resources and seem to be doing a horrible job."*

*Vera Goods, 2nd Chief, Takotna Village Council and Dick Newton, Chairman, Takotna Community Association wrote*

□□-

## **ORAL TESTIMONY**

By

Dick Newton, Takotna, Alaska

February 1 & 2, 2000

**RE: McGrath Rural Summit on Intensive Active Management,  
McGrath, Alaska**

I would like to welcome our distinguished panel to the McGrath area and thank each of you for taking the time from your busy schedules to attend this gathering that directly involves every resident of this area. I would also like to thank the McGrath Village Council and Mike and Donne Fleagle for organizing this wolf summit.

We all know Governor Knowles is responsible for the wolf problem. The members of the Legislature and Board of Game have done their jobs and are continuing to apply pressure on the Governor to sign a land and shoot option.

It's either, land and shoot or go to court. I think they should issue permits at each hub, returning the wolves to the state biologists for examination and correct count.

This looks like one of the bigger snow years and what moose is left is really going to catch hell. Friday three of us put in a trail for the Iron Dog race from Takotna to Poorman. We seen one (1) moose in 140 miles and she was dragging her belly in the deep snow.

The wolves were traveling on top of the crust leaving hardly any tracks at all, sometimes only toe nail marks, which would be near to impossible to see from the air.

We should encourage the native corporations, profit and non-profit organizations to get behind the Legislature, the Board of Game and help us apply pressure on Knowles to the point where he cannot ignore us.

If Governor Knowles refuses to commit to land and shoot and therefore immediate relief of the wolf predation in GMU 19-D, I strongly suggest we go to the third level of state government and ask the courts for relief.

Thank You,

P. 1

Sidney Huntington  
P.O. Box 49  
Galena, AK 99741  
(907) 656-1212

2000 McGrath Rural Summit on Intensive Active Management  
Testimony By: Sidney Huntington - Galena, AK

To Whom It Concerns:

I am sorry I am not there to speak before you on the wolf issue, it is really hard to write meaningfully. You can get your point over much better speaking to the issue. Yes you all know you have been in need of a predator/wolf control program for many years. You have to harvest the resource to balance the moose, in this case, with the wolf ratio. It doesn't take that much to keep both segments on a healthy balance.

You all know right now, your species are having a shameful decrease because of pressure from some people outside the area. Public emotions are in control, plus weak government officials who seem to care less for the health and welfare of your people that need proper food on the table such as moose meat.

It is not going to get better until you are able to take some wolves. It has been proven many times in the past that control methods work. To name just a few, the Koyukuk River in the Early Days, aerial hunting for wolves brought back our moose twice. The Minto Alaska wolf control brought back the moose from almost complete elimination. Today there are good numbers of moose in that area also.

To stand by and do nothing is crazy. How could our government officials tie our hands so we are not able to restore our wildlife and maintain sustainable populations. This is what we depend on for food that most of us here in rural Alaska have used for so long. Nobody wants to see all the moose in the area get killed off, or else all the wolves would die off also. The wolves would all die off after they also kill off other wildlife such as beavers.

Aerial hunting is the most efficient method to harvest wolves and the most humane also. It is cost effective and would save thousands of the State's dollars, compared to other methods. The money that is paid for a Political Study of moose:wolf ratios or whatever, could more than finance your wolf control program, and you will have results! Just to study this issue which you already know brings nothing, only less moose, when the study is over. Let's get moving and save the resource! Who is supposed to be taking care of our subsistence wildlife food resource? Or is that just a joke? Are we wards of the government? Who makes all the promises politically to their advantage? Where do we come in, only to see the very food we live on being eliminated senselessly by our very government officials who seem to control our destiny? In this case, they make us starve or make us go onto the shameful welfare. Is that Government?

Probably all you'll get is false promises. There are some other ways that work in harvesting wolves but they are slower; Aerial spotting of moose kills and then setting some snares and traps right away. This will take a good number of wolves some times. We here in Galena have balanced our ratio to where we still have some moose. There are other areas that are not doing so good. Three Day Slough is being hit hard by wolves because nothing is being done there. Without aerial support, spotting moose kills is real slow. There are other methods I never tried. They wiped out the wolves in the early 1900's by poison, which I don't care to do. It's no good, ask the Fed's, they know. They did lots of that and it wipes out the wolves along with the other wildlife.

I wish I could help you. Some people should just use some common sense and care for our wildlife and you. They need to get into actions, not just falsely talking. Get into Action! If you don't wait too long, I am sure you could see some light!

Sincerely,

A handwritten signature in cursive script that reads "Sidney Huntington". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right from the end of the name.

Sidney Huntington

Michelle John, MA, RMHC

PO Box 204

McGrath, Alaska 99627

(907) 524-3131

E-mail: [mojowrkn@mcgrathalaska.net](mailto:mojowrkn@mcgrathalaska.net)

February 1, 2000

The Honorable Tony Knowles, Governor  
State of Alaska

RE: Wolf Predation Control

***I BELIEVE THE WOLF THREAT OF SUBSISTENCE FOOD SUPPLIES IN ALASKA IS A MENTAL HEALTH CONCERN.***

I service the mental health needs of nine (9) remote villages in the tundra region of Alaska (approximately 48,000 square miles with a population of 2500). I work in a climate that celebrates the inherent wisdom of global peoples and offers a multi-cultural frame with which to explore the commonalities and differences in understanding the human condition. I have experienced the intimacy of life in the Bush and have grown to understand and appreciate the subsistence lifestyle of people in the Bush.

Given my desire to support the preservation of subsistence life in the bush, I plan to research the importance of native tradition to positive mental health among Native Americans in Alaska. There may exist strong correlation between decreases in traditional, subsistence living and intimate struggles to retain a native traditional lifestyle, such as hunting and trapping techniques, passed down from generation to generation. Therefore, the decline of subsistence food supplies, such as moose, directly may lead to the destruction of native culture and traditions.

A case may be established for the therapeutic necessity for the preservation of native traditions when working with Alaska Native Americans. Future research offers native tradition helps to foster positive identity and self-confidence, to decrease alcohol and drug consumption, and to decrease suicide rates. *To not respond to Alaska's need for continued subsistence food supplies with a predator control response is to cripple a Native Nation of Alaskans.*

To respond to efforts to stabilize the moose population in this region with wolf predator control measures is to:

- Enhance the preservation of Native traditions in the State of Alaska.
- Enhance the quality of mental health services to the people of Alaska.
- Insure food to the people of this area and prevent starvation, among other options.

*Stay tuned in.*

*Michelle John MA, RMHC*

Michelle John, MA, RMHC

Mental Health Counselor, 4Rivers Counseling Services

REV. ISRAEL JAMES DOUGLAS NELSON, MSW, D. MIN.  
BOX 13 \* MCGRATH, AK 99627  
(907) 524-3430 \* E-MAIL: ISRAEL@MCGRATHALASKA.NET

I February, 2000

The Honorable Tony Knowles, Governor  
State of Alaska

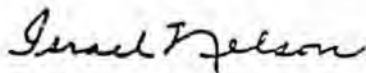
RE: Wolf Predation Control

There is ample and growing evidence that predator wolves threaten major subsistence food supplies in Alaska. The *Anchorage Daily News* for Thursday, 13 January, 2000, reported that "heavy predation" of the Nelchina caribou herd could lead to another "crash" like the 1972 event. Indeed, a draft report of the Alaska Fish and Game Department reported that, "In October and November, wolf predation was so high that if the rate observed continued, the yearly mortality rate for 1999-2000 on radio-collared animals would exceed 25 percent." Here in western Alaska, the declining moose population is approaching an "economic and subsistence disaster." The moose population in this region has diminished at the rate of about 11% per year while the wolf population appears to be increasing at the rate of about 10% per year. Already wolves have been sighted in settled areas like the City of McGrath where children walking to school are in peril of fear and psychological trauma. Already six family and working dogs in the McGrath area have been eviscerated. Decimation of the moose population places subsistence families at risk of starvation, loss of hope, and required dependence upon welfare, thus eroding the significant gains in welfare reduction you celebrated in your State of the State Address on Wednesday, 12 January, 2000.

In that Address, you said that "The rural subsistence priority is morally right, historically smart and benefits every Alaskan." When you met with residents of western Alaska in 1995, you made a promise to do something about the declining moose population, a major food source for those of us who live here. To date there has been no substantive action taken to address this emerging economic and subsistence disaster. It appears that your promise has been dashed and broken on the rocks of politics, and violates the Constitutional mandate to "allow for maximum local participation and responsibility," which you cited in your Address.

What has been requested is action which is historically demonstrated to be of value. Indeed, in Minnesota, the Federal programs to control wolf populations have killed 200 wolves per year from a significantly smaller wolf population than exists in Alaska. When the Nelchina caribou herd faced extinction in 1972, predator wolves were controlled by aerial hunting to allow the herd to recover. The precedent for hunting wolves to control their predation of subsistence food supplies exists.

In 1948, with the very able guidance and assistance of Eleanor Roosevelt, wife of Democratic President Franklin Delano Roosevelt, the United Nations adopted the Universal Declaration of Human Rights. In the Preamble, the Declaration states that "freedom from fear and want has been proclaimed as the highest aspiration of the common people." Article 25 (1) of the Declaration states, "Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, *including food* [emphasis added]...." When the Executive branch of the State of Alaska acts, or fails to act, in such a manner as to threaten the major subsistence food supplies, then the State of Alaska is in violation of the Universal Declaration of Human Rights. If the citizens of Alaska cannot have confidence that their duly elected government will act to preserve a subsistence food supply, preventing an economic and subsistence disaster, balancing politics on the backs of our children's health, safety and nutrition, then perhaps it is time for them to take their concerns to the United Nations General Assembly and seek intervention from that higher authority.



Israel Nelson  
Executive Director  
4Rivers Counseling Services

**Comments of the Alaska Outdoor Council  
Rural Summit on Intensive, Active Wildlife Management  
McGrath, Alaska. February 1-2, 2000**

**By Dick Bishop, Vice-President  
(McGrath area game biologist, ADF&G, 1969-71)**

The Alaska Outdoor Council supports active management of fish and wildlife. "Active management" as we see it includes managing for good habitat, good population numbers, and good uses by people. Biologists call this management on the "sustained yield" principle. It means managing so that fish and game will always be there, and so that people can benefit from them.

Here around McGrath and upriver is a great example of an area where active management, or sustained yield management, is really important.

There are many times within memory of people here today, including me, when moose and other game were abundant and the country was very productive. During one of those periods of abundance, while I was Area Biologist, the Alaska Dept. of Fish & Game proposed a 2 moose bag limit which was eventually approved by the Board of Game. There were also winter seasons, to accommodate traditional hunting patterns. Moose were very abundant. There is a real spin-off value when big game like moose or caribou are abundant – it's easier living for other wildlife that benefits directly – like predators, or indirectly as that food and energy filters down to furbearers, birds, voles, and other life. And people benefit, because food and fur supplies are more available.

Those times of abundance resulted from good habitat, mild winters, and big kills of wolves in some years by aerial shooting and landing and shooting.

But you don't need a long memory to know that moose or other game is not always abundant, because today moose are scarce here, and have been for many years. Fortunately, nobody is liable to starve in these times, but it sure affects the quality of life. This stalemate over active management, which is what's needed to help moose populations grow, is not necessary. Active

management, particularly wolf control, has been proposed, and approved by the Board of Game, three times in the last 15 years. Each time the proposal has been derailed by pressure on whoever was Governor from anti-hunters. The same thing has happened in other parts of the State.

Meanwhile, other management measures were put in place here in GMU 19D, including fire management to help habitat, and the Upper Kuskokwim Controlled Use Area, to limit access for moose hunters from elsewhere. I drew the lines for that Controlled Use Area at the Board of Game's request -- so if you don't like the boundaries you know who to blame!

The Alaska Outdoor Council says it's time to get down to business and manage wildlife, for the benefit of all wildlife and for people's benefit.

Predator management is ecologically correct, even though it may not be politically correct. The State of Alaska has a responsibility to manage for the benefit of Alaskans. Critics of predator management say "close hunting and game will come back." I guess they don't know that predators take 85% of big game that dies each year. Hunters take only 2-7%. Stopping hunting sounds good, but in most cases doesn't work.

We support your efforts here to urge the State of Alaska to meet its responsibilities in GMU 19(D) East, and elsewhere, by implementing predator-prey management when and where it's needed.

February 14, 2000

Honorable Tony Knowles  
Governor, State of Alaska  
PO Box 110001  
Juneau, AK 99811

Dear Governor Knowles:

the Board of Game, acting on an emergency petition from the McGrath Native Village Council, passed emergency regulation in January 2000 reauthorizing the Wolf Predation Control Implementation Plan, 5AAC 92.125(1), for Game Management Unit 19(D)-east.

The board addressed, to the best of their ability, the three criteria that you have stated from the National Academy of Sciences study to be in place before such a plan would be implemented. They found, and I agree, that there is adequate sound science, cost effectiveness, and broad public support for this plan to be carried out.

The biology is clear, the moose are in a predator pit, and continue to decline. Based on computer models developed by the ADF&G, active reduction of the wolf population for a long period of time will halt the decline and start to increase the numbers. Habitat is known to be prime riparian habitat, and is not a limiting factor in the moose population. This type of habitat can easily carry at least 1 moose per square mile, as is known from previous times here, and currently in other areas of interior Alaska with similar riparian habitat. Most wildfires are allowed to burn, creating new browse. Predation by black bears is considered, but the model shows that even with the estimated numbers of moose killed by black bears, reducing the wolf numbers will cause a reversal of the decline. Brown bears are few in the subunit, and are not considered to be a primary predator of moose.

The plan can be carried out cost effectively, by allowing the wolf harvest to be done by private citizens with their own aircraft. The first year of the program would have to be done by aerial shooting permits, and subsequent years could be managed by land-and-shoot permits. Or, these pilots could be hired by the Department temporarily to accomplish the same goal. As far as the cost of not doing the plan, one must consider the cost of subsistence meat to the families living in the area. With the high cost of meat that is flown in from Anchorage, a moose easily becomes worth anywhere from \$2000 to \$3000. One needs to also consider the cost to our way of life, one that we have grown to become dependent on, and that is having a sustainable harvest of moose and having wolves, too. If the current trend continues, we will fall into a very low equilibrium of moose and wolf numbers for possibly decades.

Concerning broad-based public support, almost everyone in this area agrees that we must act soon. A majority of people in the state, whether they reside in rural or urban Alaska, support the idea of reducing predation for healthy prey populations. When Channel 2 News did an online poll during the reporting of the passage of the emergency regulation, the result was in favor. Conservation group representatives, when asked if they would support wolf reduction in an area of biological emergency, stated that they would.

When the issue was first raised in 1994, the moose had already begun a precipitous decline, and at that time, ADF&G biologists estimated in 1995 the population to be around 1900, for a density average of .37 moose per square mile. With the population of wolves figured to be around 160, they found the prey:predator ratio to be 12:1. A healthy ratio is known to be 50:1. With this in mind, the board found that conditions warranted a wolf population reduction, and passed into regulation the control plan, to be implemented beginning in 1997. The board was petitioned to implement earlier and the board agreed to start the program in 1996. As a result of your administrative decision, even after visiting the area and talking to local people, the plan was never carried out.

We are faced with more of an emergency now, some feel it should be considered an ecological disaster. The moose have been estimated in 1999 to be about 1400, a decline of about 25%-35%. The wolves were last estimated in February 1997 to be about 56. We feel that this number is not a fair representation and the numbers are now much higher taking into account that the estimate is three years old now (and wolves do reproduce) and the census was completed after a successful trapping year. Furthermore caribou that were present for part of the winter had just left, with wolves following. Wolves reproduce easily, and in 3 years would have been able to easily double or triple their numbers. Trapping efforts have not been as successful in the following years, due to climatic conditions. This past winter, 1998-99, saw another influx of caribou into the region, and they stayed longer. It is thought that the plentitude of alternate prey had a dramatic effect on the wolves' reproduction this past spring. Pack sizes are large, and when in the field moose hunting this fall, almost everyone heard wolves howling nearby, or saw ample evidence of them.

I appeal to you now, Governor, as one who cares about the people that you represent. Please do not withhold your approval on this important program any longer. Please allow the Department to uphold their duty to provide for sustained yield of our moose population. The future of this entire ecosystem of the Upper Kuskokwim is in your hands. We hereby request that formal action be taken NOW. The implementation date is February 1, 2000.

Thank you.

Sincerely,

Donne Fleagle



**UNITED STATES  
DEPARTMENT OF THE INTERIOR**

BUREAU OF INDIAN AFFAIRS  
Juneau Area Office  
P.O. Box 25520  
Juneau, Alaska 99802-5520

February 16, 2000

The Honorable Tony Knowles  
Governor, State of Alaska  
P O Box 110001  
Juneau, Alaska 99811

Re: Wolf Control Unit 19 (D)

Dear Governor Knowles:

I am writing in support of your previously approved Wolf Predation Control Implementation Plan, 5AAC 92.125, which the State Board of Game also approved. As you know, moose is of ultimate importance to the residents of Unit 19 as a subsistence resource.

Your Plan is based upon solid science, has had cost-benefit analysis, and it also has broad public support by the residents of Unit 19 and Alaska. The people of Alaska have on numerous occasions supported subsistence as a priority for rural residents. The residents of Unit 19 have plead for your support and attention to the dire straits that they find themselves in because of unchecked wolf predation in their area.

Your board has heard all the evidence and has in fact adopted this plan. It was to take effect on February 1, 2000. We therefore respectfully request that you honor the directive of your Board of Game. It is the humane thing to do for the residents of Alaska who reside in Unit 19 and those who harvest moose in Unit 19(D) east.

Certainly you must agree that subsistence food is more important than the retention of moose populations merely to feed roving wolf packs. When we care more about animals than about our human residents, we indeed fail to serve the people we are appointed to protect and represent.

Sincerely,



Niles Cesar

BIA Regional Director

cc: Donne Fleagle ✓  
McGrath, Alaska

Beyond court cases, constitutional amendments, government to government talks, federal and state subsistence policies, in village Alaska, where heavy dependence on renewable resources exist, there is the recognition of strong linkages between subsistence needs not being met and predation. When the predator-prey ratios reach such an imbalance as to threaten one species, concerns become fears. Many people in rural Alaska can tell you what is it like to go through a winter without a moose or a caribou and how it felt to hunt and hunt and still return home without the traditional food needed for winter months. Many can also tell you, without a degree in biology, what sign they saw on the sand bars and what is happening in their environment. Many can go back years and give a year by year record. Life in the villages is demanding and we villagers generally go about our own business until food and the lack of it is knocking on doors. We know too that Governor Knowles has consistently blocked any effort that will effectively manage wolf predation on moose and caribou in the Interior of Alaska. Despite research and professional recommendations by biologists of the Department of Fish and Game, despite formal actions by the Board of Game, despite pleas from rural residents, Governor Knowles refuses to allow the Department to implement even those wolf control plans which have been formally adopted

Testimony from Donne Fleagle

by the Board. Plans that were not frivolously developed over cups of coffee but where sound science was used, years of studies presented and after public review. He has vetoed legislative attempts to override his Executive interference with Game management - specifically with wolf predation management. And the people in the Villages know all this. Anger about this is seldom aired by rural folk in the media of Alaska's big and remote cities. It is expressed bitterly in personal conversations and local meetings. Let it be said that We have coexisted with nature for thousands of years. We celebrate our way of life and rich heritage that has been passed down from generation to generation by teaching our children time tested ways to live in our country off of the land. We rejoice in seeing wildlife in its natural habitat and what we harvest, we use in countless ways. We believe that managing ecosystems that contain wolves which are in abundance in Alaska is necessary for all the animals and for the people. Some areas are on the verge of ecological disaster. Moose and caribou headed for "crashes" or near "extinction" which only spells doom for the wolves who will then starve after wiping out the beaver. Managing wolves will not eliminate wolves nor does anyone wish to see all wolves gone. On the contrary, we wish to see both big game and other species thrive in their environment which is not the case in many areas of Village Alaska. The people in the villages also know that moose and

caribou populations continue to decline at alarming rates and that wolf packs are growing in number, size and daring. In village Alaska, several working and pet dogs have recently been eaten by wolves, wolf tracks on the edge of villages or within villages are common-place now. Mothers are seeing wolves in their yards and are alarmed for their children who walk to school in the mornings in the dark and whose children play outdoors. Moose reproduction rates are much lower than wolves. Village Alaskans know that. The scientists know that. Even when bounties were paid for wolf hides and aerial hunting of wolves was allowed, the wolves held on and their numbers quickly bounced back. Aggressive wolf control will not threaten their survival. There is no question that the vast majority of Villagers want active reduction of wolf numbers by the State. It would cost the State nothing to allow locals to shoot wolves from small airplanes. Apparently the Governor does not trust the judgment of village Alaskans, nor does he seem to trust hired biologists in the AK D F&G. Governor Knowles should support a healthy subsistence resource. He should support State biologists. There would be much to be gained for all of us if he would. It appears to us, however, that his priority is appeasement of those in the cities of Alaska and the Lower 48 who would brook no killing of wolves despite the fact that in some areas, the wolves have now started to eat themselves. What is more cruel? We are

not ashamed of being hunters and gathers nor are we ashamed of being wildlife managers or knowing our country. Wolf watching has unique opportunities but coming upon a sight where sled dogs and or domestic pet dogs have been attacked, killed and eaten or sites where wolves have eaten one of their own leaving just the wolf head is not a sight that would bring joy to a tourist or a someone wanting to see wildlife its natural environment. We do not live on the road system in Rural Alaska and tourists are not seen on our streets in buses with cameras and the like. Sometimes it is wise to correct imbalances for all living things.

**My Name is Fred John Jr and I am from Mentesta Lake. I am the Chairman of Ahtna, Incorporated. I live in Unit 13 where there is now grave concern for our caribou and moose herds. Our caribou herd, the Nelchina, are on the verge of a crash. There are 500 wolves in our Game Unit and they are eating 15,000 caribou a year and 6,000 moose per year. We also lose moose and caribou to natural causes and causes brought on by deep snow and stress. Bears also are predators but they are only part time hunters. Wolves are year around. Our 8 villages are heavily dependent upon the moose and caribou. We are subsistence users and we know our environment needs active wildlife management in order to save our caribou and moose. You can't just manage people by shortening seasons or going into Tier II. We have yet to see any area that has gone into Tier II ever come out of it and we are right behind the Upper Kuskokwim Area. We need a Wolf Control Plan and we hope that the State Board of Game passes one in March. We don't want to wipe out all the wolves but we believe that we can all live together in good systems.....the wolf, the bear, the beaver, the moose, the caribou and us, the people. We want the Governor to start managing for the village people and not to wait! Don't manage for the outside interests because our lives depend on it! Governor, support a Unit 13 Wolf control Plan and support Unit 19 Deast.**

**My name is James Berlin and I live in Bethel. I am the Resource Specialist for the Natural Resources Department of the Association of Village Council Presidents encompassing 56 tribes and representing 20,000 plus members. We are in support of Predator Control and know what our neighbors at the headwaters of the Upper Kuskokwim River are facing. We are in full support of their efforts to save what little moose they have from extinction and ask the Governor to act NOW on the Wolf Control Plan reauthorized by the State Board of Game last month. The Governor has pointed the finger at Bethel Hunters saying on a Statewide Radio Show February 1st to Herman Morgan of Aniak, that 60% of the moose harvested in Unit 19De are Bethel Hunters and as he said, "It is a little crowded in the neighborhood." Everyone on the Kuskokwim River was insulted at the poor attempt to turn the river people against one another. Statistics show that in 1997, there was one hunter from Sleetmute and below with one success. In 1998, there were 5 hunters from Sleetmute and below with zero successes. That is not**

60% and those figures are the Alaska Department of Fish and Game's harvest numbers for 19De. Already in some of our villages, our people are facing the same subsistence issues of not getting their winter food supplies due to wolves which even have gone into Chuathbaluk in the summer eating 10 dogs which were tied up and defenseless. It is unusual for wolves in the summer to behave like this and we are all alarmed. In Quinahagak and Eek, villagers are reporting large packs which they haven't seen in years and they are concerned for their caribou and moose especially with deep snow that makes the caribou and moose weak and vulnerable. Trappers and Hunters are doing all we can to change the predator and prey ratios giving our big game all the help we can. Even with our hard efforts at wildlife management, we recognize the need for Predator Control. We do not want to wait until the renewable resources are depleted to a point where Tier II would have to be used. Our subsistence way of life is too important to be ignored by ANYONE. Governor, now is the TIME to ACT.

My name is Darrell Vent and I am from the village of Huslia in the Doyon and TCC region. Over half of our villages attended the Statewide Rural Summit on Intensive/Active Management in McGrath which was hosted by the McGrath Tribal Council February 1 and 2 and all of our villages supported the 19De Wolf Implementation Plan and we request the Governor to take formal action now before the Moose are entirely wiped out in the Upper Kuskokwim. In our region, many villages are reporting large packs of wolves, near villages, health and safety concerns and subsistence users who did not get their Moose or caribou to carry them through the long winter. Already the village of Takotna has declared a Health and Safety Emergency. They have children and elder(s) who walk the roads and one is blind. They are afraid for their peoples safety. As our respected Elder Sidney Huntington said in his written testimony for the McGrath Meeting, "It is not going to get better until you are able to take some wolves. It has been proven many times in the past that control methods work. To name just a few, the

**Koyukuk River in the early days, aerial hunting for wolves brought back our moose twice. The Minto Alaska wolf control brought back the moose from almost complete elimination. To stand by and do nothing is crazy? How could our government officials tie our hands so we are not able to restore our wildlife and maintain sustainable populations. Who is supposed to be taking care of our subsistence wildlife food resource? Or is that just a joke? Who makes all the promises politically to their advantage?" Sidney lives in Galena and served on the Board of Game for over 19 years and he has seen shortages. Sidney said, "I wish I could help you. Some people should just use some common sense and care for our wildlife and you. " I say on behalf of TCC, Our people's health and welfare need proper food on the table such as moose and caribou meat. We do not want to see what happened on the Great Plains when all the Buffalo were wiped out. We will not stand for that. Not in a modern day society.**

**ALASKA FEDERATION OF NATIVES, INC  
SPECIAL CONVENTION  
RESOLUTION 00-06A**

**TITLE: SUPPORT FOR IMPLEMENTATION OF PREDATOR CONTROL PROGRAMS IN ALASKA IN ORDER THAT ALASKA NATIVES MAY PRESERVE TRADITIONS WHICH FOSTER POSITIVE IDENTITY, SELF-CONFIDENCE, AND MEET THE NUTRITIONAL AND SPIRITUAL ELEMENTS OF ALASKA'S FIRST PEOPLES**

**WHEREAS:** The health, safety, welfare, education, economics, employment opportunities and preservation of cultural and natural resources of Alaska's Native people's are the primary goals and objectives of the Alaska Federation of Natives, Inc; and

**WHEREAS:** The Native peoples of Alaska have for countless generations been provided the means for their subsistence by careful harvesting of the wild animals, fish and other wildlife that exists in nearby waters; and

**WHEREAS:** The populations of some of the larger mammals on which the Native peoples of Alaska have always depended for their subsistence, such as moose and caribou, have been greatly diminished by predators such as the wolf; and

**WHEREAS:** The Native peoples of Alaska have long recognized the need for predator control in order to allow the maintenance of healthy populations of the wild animals on which many Native villages and their members depend for subsistence; and

**WHEREAS:** The wolf has been largely protected over the past several decades through federal and state laws which have allowed wolves the unchecked opportunity to feed on the moose and caribou populations in Alaska; and

**WHEREAS:** Statistics gathered by the Alaska Department of Fish and Game show a considerable decline over the past 15 years in the number of Native and other residents in many areas who are able to provide subsistence for their families as a result of a successful moose or caribou hunts; and

WHEREAS: The Governor of Alaska and the Commissioner of Fish and Game have the power to implement a predator control program developed by the State Board of Game, which includes the killing of enough wolves to allow the population of moose and/or caribou to be replenished over time - but have refused to do so; and

WHEREAS: Participants in a recent Rural Alaska Summit held in the Native Village of McGrath concluded that a predator control program should immediately be put in place for the benefit of all the residents of rural Alaska; and

WHEREAS: The Governor of Alaska has also decided to appeal the *Katie John* decision, thus challenging a court decision on subsistence;

NOW THEREFORE BE IT RESOLVED that the delegates to the Special Convention of the Alaska Federation of Natives hereby support the conclusion reached by the participants in the recent Rural Alaska Summit in McGrath and requests that the State of Alaska, by action of its Governor or Commissioner of Fish and Game, immediately implement the Wolf Predation Control Implementation Plan under 5AAC.92.125(1) for Game Management Unit 19D(e) so that the right of Alaska Natives to a subsistence living may be meaningful; and

BE IT FURTHER RESOLVED that AFN hereby request that the Governor and the State of Alaska formally recognize the right of Alaska Natives to subsistence hunting and fishing and allow them to be meaningfully exercised.

SPECIAL CONVENTION ACTION: Amended/passed



# Rural Alaska Community Action Program, Inc.

RurAL CAP Board of Directors

## RESOLUTION #00-02

**ENTITLED:** Support for implementation of predator control programs in Alaska so that Alaska Natives may preserve Native traditions which foster positive identity, self confidence, and meets the nutritional and spiritual elements of Alaska's first peoples.

**WHEREAS;** we, the Rural Alaska Community Action Program, Inc. do hereby establish and submit the following resolution; and

**WHEREAS;** the Rural Alaska Community Action Program, Inc. organization established in 1965 and comprised of representatives of and advocates for low-income and rural people; and

**WHEREAS;** the health, safety, welfare, education, economic and employment opportunity, and preservation of cultural and natural resources are primary goals and objectives of the rural Alaska Community Action Program, Inc.; and

**WHEREAS;** the Native peoples of Alaska have for countless generations been provided the means for their subsistence from careful harvesting of the wild animals, fish and other wildlife that exists in Alaska and in nearby waters; and

**WHEREAS;** the populations of some of the larger mammals upon which Native peoples of Alaska have always depended for their subsistence, such as moose and caribou, have been diminished greatly by predators, such as the wolf; and

**WHEREAS;** the Native peoples of Alaska have long recognized the need for predator control in order to allow the maintenance of healthy populations of the wild animals upon which many Native villages and their members depend for subsistence; and

**WHEREAS;** the wolf has been largely protected over the past several decades through Federal and state law, which has allowed wolves the unchecked opportunity to feed on the moose population in Alaska; and

**WHEREAS;** statistics gathered by the Alaska Department of Fish and Game show a considerable decline over the past 15 years in the number of Native and other residents in many areas of Alaska who are able to provide subsistence for their families as a result of a successful moose hunt;

**WHEREAS;** the Governor of Alaska and the Commissioner of Fish and Game have the power to implement a predator control program, developed by the State Board of Game, which

includes the killing of enough wolves to allow the population of moose and/or caribou to again be replenished over time, but have refused to do so; and

WHEREAS; participants in a recent Rural Alaska Summit held in the Native Village of McGrath concluded that a predator control program should immediately be put in place for the benefit of all of the residents of Rural Alaska; and

WHEREAS; the Governor of Alaska has also decided to appeal the Katie John Decision thus challenging a subsistence court decision on subsistence.

Now, therefore be it

RESOLVED: That the Rural Alaska Community Action Program, Inc. does hereby support the conclusion reached by the participants in the recent Rural Alaska Summit held in McGrath and requests that the State of Alaska, acting through its Governor or the Commissioner of Fish and Game, immediately implement the Wolf Predation Control Implementation Plan under 5AAC.92.125(1) for Game Management Unit 19D(c) so that the right of Alaska Natives to subsistence living may be a meaningful right; and

Be it further

RESOLVED: that the Rural Alaska Community Action Program, Inc. does hereby request that the Governor of Alaska and the government of the State of Alaska formally recognize the right of Alaska Natives to subsistence hunting and fishing and to allow them to be meaningfully exercised.

ADOPTED this 14<sup>th</sup> day of February 2000 at a scheduled Executive Committee meeting of the Board of Directors of the Rural Alaska Community Action Program.

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David Eluska, Secretary/Treasurer  
RurAL CAP Board of Directors

**TAKOTNA TRIBAL COUNCIL  
GENERAL DELIVERY  
TAKOTNA, ALASKA 99675  
(907) 298-2212  
Fax: (907) 298-2314  
Carol Abraham, 1<sup>st</sup> Chief**

RESOLUTION # Resolution # 00-2-9

**Local Wolf Predation Control**

WHEREAS, the Takotna Tribal Council is the legally constituted and governing body of the Alaskan Native village of Takotna, Alaska; and

WHEREAS, the village of Takotna is extremely concerned with the Health and Safety of our Children, Elderly and Handicapped people of our village regarding the over population of Wolves roaming in and around our village, within a 1 mile radius; and

WHEREAS, Governor Knowles and his Administration has not or will not put into effect an emergency wolf control in unit 19D; and

WHEREAS, the Takotna Tribal Council with their Wildlife and Parks funds will seek ways of offering incentives to area trappers and further dedicate these funds to the control of the wolf population in GMU 19D; and

NOW THEREFORE BE IT RESOLVED, that the Takotna Tribal Council and it's members along with the entire community unanimously agree with this decision.

**CERTIFICATION**

\_\_\_\_\_  
Carol M. Abraham, 1<sup>st</sup> Chief

\_\_\_\_\_  
Vera Lynn Goods, 2<sup>nd</sup> Chief

\_\_\_\_\_  
Fredrick P. Capsul, 3<sup>rd</sup> Chief

\_\_\_\_\_  
Anna Benedict, Medicine Person

\_\_\_\_\_  
Theresa E. Fox, Sce/Teas.

This certifies that Resolution # 00-2-9 was duly passed at a Takotna Tribal Council meeting this 9 day of February, 2000 at which a quorum was present and voting at all times.

We Support the 19D East Wolf Predation Control Implementation Plan 5AAC.92.125(1)

	PRINT NAME	SIGNATURE	ADDRESS
1	MICHELLE JOHN	Michelle John	PO Box 214 McGrath AK 99627
2	Thomas Apo	Thomas Apo	Box 50, Holy Cross 99502
3	Helena Vanderpool	Helena Vanderpool	Box 213 McGrath AK 99627
4	Tamara Vanderpool	Tamara Vanderpool	Box 156 McGrath AK 99627
5	Kristie Lyman	Kristie Lyman	Box 168 McGrath AK 99627
6	Peter Snow	Peter Snow	Box 143 McGrath AK 99627
7	Jerad J. Vanderpool	Jerad J. Vanderpool	Box 196 McGrath AK 99627
8	Brenda Cash	Brenda Cash	PO Box 163 McGrath AK 99627
9	Del Matley	Del Matley	Box 33 McGrath AK 99627
10	John Harris	John Harris	Box 64 McGrath AK 99627
11	Ephrem Andrews	Ephrem Andrews	Box 114 McGrath AK 99627
12	Mike Flengle	Mike Flengle	Box 33 McGrath AK 99627
13	NANCY F. ESAI	Nancy F. Esai	Box 28 McGrath AK 99627
14	Grace T. Holuberg	Grace T. Holuberg	Box 5 " " "
15	Ron PARISH	Ronald Parish	Box 201 " " "
16	Margaret Morgan	Margaret Morgan	Box 68 McGrath AK 99627
17	Robbelle Stricker	Robbelle Stricker	PO Box 292 McGrath AK 99627
18	Joyce Turner	Joyce Turner	P.O. Box 8 McGrath AK 99627
19	Jeannie Egan	Jeannie Egan	Box 145 McG. 99627
20	Lisette Jent	Lisette Jent	Box 22
21	Richard C. Strick	RICHARD C. STRICK	PO Box 155 McGrath 99627
22	Simon Butler Strick	Simon Butler Strick	P.O. Box 155 McGrath AK 99627
23	Robert Maguire	Robert Maguire	4620 Ann Dr McGrath AK 99627
24	Bryan Faderm	Bryan Faderm	P.O. Box 77 McGrath AK 99627
25	Judy Kuhn	Judy Kuhn	Box 43 McGrath AK 99627
26	DANIEL A. KELLER	Daniel A. Keller	PO 77 McGrath AK 99627
27	Betty Magnuson	Betty Magnuson	Box 123 McGrath 99627
28	Ami Chisholm	Ami Chisholm	Box 75 McGrath AK 99627
29	Cindy Cox	Cynthia A. Kallad	Box 241 " " "
30	LEWIS EGRASS	Lewis Egrass	Box 177 McGrath AK 99627
31	Dorotte-Mailelle	Dorotte Mailelle	Gen Del McGrath AK 99627
32	James Berlin	James Berlin	P.O. Box 2125 Bethel AK 99509
33	Bill HAGAR	Bill Hagar	431-GAFFNEY Rd Bethel 99701
34	JOE MATTIE	Joe Mattie	Box 18 Bethel AK 99725
35	Fred John Jr	Fred John Jr	PO Box 6024 Mentasta Lake, AK 99788

# Grayling Residents

PRINT NAME	SIGNATURE	ADDRESS
<del>Marvin Deacon</del>	<del>Marvin Deacon</del>	<del>PO Box 45 Grayling, AK</del>
GABRIEL H. NICKOLI	Gabriel H. Nickoli	Box 64, Grayling, AK
Herman Deacon	Herman Deacon	P.O. Box 38 Grayling AK 99590
VICKY J. MAILLELLE	Vicky J. Maillelle	P.O. Box 35 Grayling AK-99590
Thomas J. Maillelle	Thomas J. Maillelle	PO Box 55 Grayling AK 99590
Sue Anaborchauer	Sue Anaborchauer	Box 53 Grayling, AK 99590
Edna Deacon	Edna Deacon	Box 63 Grayling AK. 99590
Dora Peter	Dora Peter	Gen. Del. Grayling, AK 99590
EVELYN DEACON	Evelyn Deacon	P.O. Box 83 Grayling, AK. 99590
Patricia Solomon	Patricia Solomon	P.O. Box 23 Grayling, AK. 99590
Barbara Nickoli	Barbara E. Nickoli	P.O. Box 73, Grayling, AK 99590
ELEANOR HANNA	Eleanor Hanna	P.O. Box 94 Grayling, AK 99590
Tanise Maillelle	Tanise Maillelle	Box 53 Grayling 99590
Mairie Maillelle	Mairie Maillelle	Box 55 Grayling AK 99590
Ruth Maillelle	Ruth Maillelle	Box 77 Grayling, AK. - 99590
Lucy Golie	Lucy Golie	Box 43 Grayling AK 99590
Wilfred Deacon	Wilfred Deacon	Box 83 Grayling AK 99590
Archie Deacon	Archie Deacon	Box 42 Grayling AK 99590
Sienna Deacon	Sienna Deacon	Box 104 Grayling, AK 99590
Sam Burkett	Sam Burkett	Box 12 Grayling, AK 99590
Joseph Maillelle	Joseph Maillelle	Box 17 Grayling AK 99590
Phil Nickoli	Phil Nickoli	P.O. Box 24 Grayling, AK
Gabriel J. Nickoli	Gabriel J. Nickoli	P.O. Box 28 Grayling, AK
Eleanor Maillelle	Eleanor Maillelle	Gen. Del. Grayling AK 99590
RALPH CONATSE	Ralph Conatse	P.O. Box 70 GRAYLING 99590
Angela Howard	Angela Howard	P.O. Box 69 Grayling, AK 99590
Eva Nickoli	Eva Nickoli	P.O. Box 85 Grayling, AK 99590
Shirley Clark	Shirley Clark	Box 11 Grayling AK 99590
Todd Maillelle	Todd Maillelle	Box 55 Grayling AK 99590
Bernice Maillelle	Bernice J. Maillelle	Box 28 Grayling AK 99590
Bessie Solomon	Bessie M. Solomon	Box 64 Grayling, AK 99590

We Support the 19D East Wolf Predation Control Implementation Plan 5AAC.92.125(1)

	PRINT NAME	SIGNATURE	ADDRESS
36	Lucille Magnuson	Lucille Magnuson	Box 111 McGrath AK 99627
37	VALKYRIE MAGNUSON	Valkyrie Magnuson	Box 45 McGrath AK 99627
38	Alice Magnuson	Alice Magnuson	Box 111 McGrath AK 99627
39	Diane Zorn	Diane Zorn	P.O. Box 202 McGrath AK
40	Duane J Norbeck	Duane Norbeck	P.O. Box 124 McGrath AK
41	Nestor T Norbeck	Nestor Norbeck	P.O. Box 282 McGrath AK
42	IGNATIY PETRUSKA	Ignatiy Petruska	P.O. Box 55 McGrath AK 99627
43	STEVEN GRIFFIN	Steven Griffin	P.O. Box 193 McGrath AK
44	Bill Vanbong	Bill Vanbong	P.O. Box 268 McGrath AK
45	Marlene	Marlene	Box 93 McGrath AK 99627
46	LARRY D GONDEK	Larry D Gondek	Box 275 Gakona AK 99586
47	CHARLES MARXEN	Charles Marxen	2200 Colours Ln Anch AK 99507
48	CLAIRE DELICHTER	Claire Delichter	Box 154 McGrath 99627
49	Tim Day	Tim Day	PO BOX 7 Ketlovil AK 99650
50	Thomas Van Thiel	Thomas Van Thiel	HC 31 Box 5092 Wasilla AK 99654
51	LINDA DURAN	Linda Duran	P.O. Box 2381 PALMER AK 99645
52	Donna Polston	Donna Polston	P.O. Box 10030 Fairbanks, AK
53	Janet Hecker	Janet Hecker	7641 Umbels Anchorage AK 99518
54	JOANN SHIRLEY	Joann Shirley	P.O. Box 940408 HOUSTON AK 99691
55	Terylene Andrews	Terylene Andrews	PO Box 114 MCG, AK 99627
56	David Shalborne	David Shalborne	P.O. Box 35 McGrath AK 99627
57	Wilma Payne	Wilma C. Payne	P.O. Box 190 McGrath AK 99627
58	Lionna Miller	Lionna Miller	Box 138 McGrath 99627
59	Michael Baumgartner	Michael Baumgartner	Box 121 McGrath 99627
60	Carol Whitworth	Carol Whitworth	Box 251, McGrath, AK 99627
61	Maragret Parish	Maragret Parish	Box 201 McGrath, AK 99627
62	Gail Sherrer	Gail Sherrer	Box 88 McGrath AK 99627
63	RYAN ABBASINIA	Ryan Abbasinia	Box 11 MCGRATH AK 99627
64	LUDITH STEVES	Ludith Steves	79 99627
65	Isabelle Harrington	Isabelle Harrington	Box 164 McGrath AK 99627
66	Thelma Norton	Thelma Norton	Box 108 McGrath, AK 99627
67	Angela Bain	Angela Bain	Box 286 McGrath AK 99627
68	ISRAEL NELSON	Israel Nelson	Box 13 McGrath, AK 99627
69	Helen E. Edwards	Helen E. Edwards	Box 90 McGrath AK 99627
70	Norv Dullin	Norv R Dullin	Box 329 McGrath AK 99627

	PRINT NAME	SIGNATURE	ADDRESS
71	Donalene P. Fleagle	PO Box 33 99627	Donalene P. Fleagle
72	Oline T. Petruska	Oline Petruska	Box 9111 Nikolai
73	Paula L. Harris	Paula L. Harris	Box 64 McGrath
74	Don Baird	Don Baird	Box 17 McGrath
75	James M. Smarz	James M. Smarz	Box 14 McGrath
76	STEFFEN STRICK	Steffen Strick	Box 128 McGrath
77	RICH STRICK SR	Rich Strick Sr	PO Box 281 McGrath AK
78	Theron Magnuson	Theron Magnuson	PO Box 198 McGrath AK
79	Uma J. Melbr	Uma J. Melbr	Box 16 McGrath AK 99627
80	Mark H. Melbr	Mark H. Melbr	Box 170 McGrath AK 99627
81	Benton D. Magnuson	Benton D. Magnuson	Box 46 McGrath AK 99627
82	Joe Collins	Joe Collins	Box 188 McGrath AK 99677
83	JOHN RUNKLE	John Runkle	Box 9127 Nikolai 99691
84	MARTHA RUNKLE	Martha Runkle	P.O. Box 9127 Nikolai 99691
85	SHARON B. RUNKLE	Sharon B. Runkle	Box 9132 Nikolai 99691
86	Judith L. Ferguson	Judith L. Ferguson	Box 130, Delta Jct., AK. 99731
87	Jess Johnson	Jess Johnson	3936 Boniface Pkwy Apt. 2 Anchorage 9950
88	Kathy Gaidis	Kathy Gaidis	15012 Kenwood Ct, Woodbine, MD 21797
89	Jim Lavery	Jim Lavery	PO 91757 Anchorage AK 99507
90	Phil Grady	Phil Grady	Live in Alaska
91	Melinda Lyman	Melinda Lyman	PO Box 202 McGrath, AK
92	Jaime McCaslin	Jaime McCaslin	438 Keeling Rd North Pole, AK 99705
93	Carolyn J. Vanderpool	Carolyn J. Vanderpool	PO Box 218 McGrath, AK 99627
94	Glen A. Hanway	Glen A. Hanway	PO Box 15 McGrath AK 99627
95	Connie Woodard	Connie Woodard	Box 92 McGrath AK 99627
96	VERONICA SNOW	Veronica Snow	Box 268 McGrath, AK 99627
97	T. Ernest Baumgartner	T. Ernest Baumgartner	Box 206 McGrath, AK 99627
98	Tom Johnson	Tom Johnson	Box 113, McGrath, AK 99627
99	Mary Jane Vanderpool	Mary Jane Vanderpool	PO Box 186, McGrath AK 99627
100	Carol Tyler	Carol Tyler	PO Box 521362 BIG LAKE 99652
101	JAMES Vanderpool	JAMES Vanderpool	P.O. Box 186 MCG. AK 99627
102	MARK DIXON	Mark Dixon	P.O. Box 96 McGrath, AK 99627
103	Lena Petruska	Lena Petruska	Crooked Creek AK / McGrath
104	Douglas N. Tony	Douglas N. Tony	P.O. Box 196, MCG, AK 99627
105	Myra J. Olsen	Myra J. Olsen	Box 74, Egegik, ALASKA 99579

We Support the 19D East Wolf Predation Control Implementation Plan 5AAC.92.125(1)

	PRINT NAME	SIGNATURE	ADDRESS
106	Sharon Condon	Sharon Condon	POB 217 McGrath 99627
107	Oliver Johnson	Oliver Johnson	P.O. 1935 White Alaska 99619
108	Alexander Bobby	Alexander Bobby	Box 273 McGrath, AK 99627
109	Ken W. Chase	Ken W. Chase	ANVIK - McGrath
110	Judi Walker	Judi Walker	Atley Road AK 99627
111	JOHN YATES	John Yates	Box 258 McGrath 99627
112	Alfred R. Evans	Alfred R. Evans	Box 87 Delta St. 99741
113	Pat Sully	Pat Sully	Box 60300 AK 99200
114	Michael J. Stickman	Michael J. Stickman	PO Box 64 Nikita AK 99765
115	PERCY Lohwitz	Percy Lohwitz	PO Box 25 Koyukuk AK 99754
116	Gary Lawrence	Gary Lawrence	PO Box 269 Ft. Yukon AK 99740
117	WAYNE NICKOLI	Wayne Nickoli	PO Box 16 Teller AK 99708
118	WALTER W. Newman	Walter W. Newman	P.O. Box 772 McGrath AK
119	Carl Paul	Carl Paul	Gen'l Del. Kipnuk, AK 99614
120	Stanley Ned	Stanley Ned	Gen Del. Allakaket AK 99720
121	Gabe Sam	Gabe Sam	Huslia, AK 99746
122	Jack Ambrose	Jack Ambrose	Hughes Co AK 99745
123	Robert P. Hardy	Robert P. Hardy	Wasilla, AK 99687
124	Debbie Lee	Debbie Lee	Box 927 Bethel, 99509
125	Philip J. Tutus	Philip J. Tutus	Umiat, AK 99758
126	Philip J. Tutus	Philip J. Tutus	Nikolski 99691
127	Clinton Goods	Clinton Goods	Talrota AK 99675
128	Harold N. Brown	Harold N. Brown	FR2 First Ave Ste. 600 Fairbanks, AK 99701
129	Loretta St. Lohwitz	Loretta St. Lohwitz	POB 25 Koyukuk, AK 99754
130	Sativa Quinn	Sativa Quinn	1577 C St, Suite 304, Anchorage 99503
131	Carl Morgan	Carl Morgan	
132	Bert Wolf	Bert Wolf	POB 214 McGrath
133	Kenneth Ballou	Kenneth Ballou	
134	Barney Edison	Barney Edison	Box 50501 Pilot Station
135	Nick Poyvaka	Nick Poyvaka	Box 911 Nikolski
136	Jonathan Solomon	Jonathan Solomon	Box 78 Pt. Yukon AK
137	Jack Turner	Jack Turner	Box 8 McGrath, AK
138	FRED MYERS	Fred Myers	321 Arbor Oaks Gr Millersville MD
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140	ROSALIE EGRASS	Rosalie Egrass	Box 178 McGrath AK 99627

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143	Dete Kelli	Dete Kelli	511 E. Slater Drive Fhks AK
144	Rick Halford	Rick Halford	Box 190 Chugiak AK 99577
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146	Shirley L Lee	Shirley L Lee	457 Cindy Dr Fhks AK 99701
147	Alfred R Ketzler Sr	Alfred R Ketzler Sr	1628 Cottonwood St Fairbanks AK 99709
148	Wendy Caldwell	Wendy Caldwell	P.O. Box 60996 Fhks
149	Jan R. Jo Royal	Jan R. Jo Royal	Box 32 McGrath AK 99627
150	Chuck Brustner	Chuck Brustner	P.O. 158 McGrath AK 99627
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152	Alvin Mikala	Alvin Mikala	P.O. Box 9145
153	Maxie Alure	Maxie Alure	Sleetmute, AK 99688
154	Leonard Andrews	Leonard Andrews	Box 177 McGrath, AK
155	Andrew Fredaruk	Andrew Fredaruk	P.O. Box 30 Sleetmute AK
156	JAMES FINE	James Fine	Box 93 McGrath, AK 99627
157	Alice Crow	Alice Crow	PO Box 6115 Wanilla 99687
158	RAY COUNES	Ray Caines	Box 75 McGrath AK 99627
159	Michael J. Walker	Michael Walker	330 Wendell St. Seward, FLs. AK 99201
160	Barbara Deardorff	Barbara Deardorff	P.O. Box 233 McGrath
161	Nichelle K.R.	NICHELLE JOHN	PO Box 204 McGrath 99627
162	Bob Magnus	Bob Magnus	Box 111 McGrath 99627
163	Melody Strick	Melody Strick	Box 128 McGrath, AK 99627
164	Charlotte Gover	Charlotte Gover	Box 205 McGrath AK 99627
165	GARY EGERS	Gary Eggers	Box 175 McGrath, AK 99627
166	Nicholas P Snow	Nicholas P Snow	P.O. Box 242 11 71 71
167	Naromi Norback	Naromi Norback	P.O. Box 282 McGrath, AK 99627
168	Mark Alessi	Mark Alessi	P.O. Box 107 McGrath
169	Arnold Andrews	Arnold Andrews	P.O. Box 135 McGrath AK
170	David Miller	David Miller	THURSTON AK 99627
171	Ephrem Andrews	Ephrem Andrews	McGrath, AK, 99627
172	Sally Andrews	Sally Andrews	Box 135 McGrath AK 99627
173	LEWIS EGASS	Lewis Egass	Box 132 McGrath AK 99627
174	John Norton	John Norton	Box 510 McGrath
175	Lynnda Norton	Lynnda Norton	Box 100 McGrath

We Support the 19D East Wolf Predation Control Implementation Plan 5AAC.92.125(1)

	PRINT NAME	SIGNATURE	ADDRESS
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177	Mike Tierney	D. Michael Tierney	Box 142 McGrath AK 99627
178	Joseph Maikella Sr.	Joseph Maikella Sr.	Box 17 Grayling AK 99540
179	Leslie R. Mahne	Leslie R. Mahne	PO Box 276 McGrath, AK
180	Allan G. Anderson #	Allan G. Anderson #	PO Box 37 McGrath AK
181	Shana Baumgartner	Shana M. Baumgartner	Box 117, McGrath, AK 99627
182	Anabella Edwards	Anabella Edwards	Box 104 McGrath, AK 99627
183	Gina Demerhoff McKinley	Gina Demerhoff McKinley	PO Box 216, Aniak, AK 99551
184	Marie Nementoff	Marie Nementoff	PO Box 148 McGrath AK 99627
185	Bobby Smith	Bobby Smith	P.O. Box 101 Nikiski 99641
186	Judy U. Johnson	Judy U. Johnson	Box 175 McGrath 99627
187	Theresa Stollman	Theresa Stollman	P.O. Box H Graydon Center, AK 99523
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# Takotna, Alaska

	PRINT NAME	SIGNATURE	ADDRESS
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2	David Fox	David Fox	General Delivery Takotna
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4	Corey L. Rudd	Corey L. Rudd	Gen. Del. Takotna, AK 99675
5	Theresa E Fox	Theresa E. Fox	Gen Del Takotna, AK 99675
6	Kim Levato	Kim Levato	Box 5 - General Delivery Takotna
7	Misty Wachter	Misty Wachter	Box 5 - Gen. Del Takotna
8	Nadra Coronado	NADRA CORONADO	Box 10 Gen Del Takotna
9	Mary Marcove	MARY MARCOE	TAKOTNA, AK TAKOTNA
10	AMANDA Paxton	Amanda Paxton	Gen. Del.
11	Ulema Farmer	General Delivery	Takotna AK
12	Sheri Abraham	Sheri ABRAHAM	Gen. Del. TAKOTNA
13	LARRY M. FOX	Larry M. Fox	Gen. Del. Takotna AK
14	Vera Lynn Goods	Vera Lynn Goods	P.O. Box 29 Takotna, AK 99675
15	Clinton Goods	Clinton Goods	PO Box 29 Takotna AK 99675
16	Amanda Goods	Amanda Goods	P.O. Box 29 Takotna AK
17	Charles L. Gottschalk	Charles L. Gottschalk	Box 7 Gen Del Takotna AK 99675
18	LEWIS. W. WHALEN	Lewis W. Whalen	GEN DEL TAKOTNA AK 99675
19	CAROL M. ABRAHAM	Carol M. Abraham	Box 200 TAKOTNA AK 99675
20	Fred Copson	Fred Copson	PO Box 89 Takotna AK 99675
21	Shawn Abraham	Shawn Abraham	Box 2120 Takotna AK 99675
22	Violet Niles	Violet Niles	PO BOX 81 Takotna AK 99675
23	SALLY HOOPER		TAKOTNA AK: 99675
24	Tim Williams	Tim Williams	
25	Derek Wilson	Derek Wilson	Takotna AK. 99675
26	James Wilson		GEN. DEL. TAKOTNA AK
27	Jerry Birmingham		Takotna AK 99675
28	Paul Sayer	PAUL SAYER	Gen Del Takotna AK 99675
29	Tabatha J. Huffman	Tabatha J. Huffman	3 Mile Hill Takotna AK, 99675
30	Mary E. Faulkner	Mary E. Faulkner	Gen Del Takotna AK 99675
31	Kim Getgood		" " " " " "
32	Kimberly Pollaris	Kim Pollaris	Takotna AK 99675
33	Jane Newton		
34	JANICE SAYER	JANICE NEWTON	TAKOTNA, AK 99675

# Nikolai, Alaska

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3	JIMI NIKOLAI	Jim Nikolai	Box 9155 NIKOLAI 99691
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5	Linda Diaz-Barrayan	Linda Diaz-Barrayan	PO Box 9137 Nikolai, AK 99691
6	Ann G. Alexia	Ann G. Alexia	P.O. Box 9126 Nikolai, AK. 99691
7	JOSEPH H KIMBALL	Joseph Kimball	POB 9152 Nikolai 99691
8	Mary Ellen Kimball	Mary Ellen Kimball	Bx 9152 Nikolai, AK 99691
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10	Phillip Esai	Phillip Esai	P. O. Box 91, Nikolai AK
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13	Ted Esai	Ted Esai	P.O. Box 9125 Nikolai, AK 99691
14	Winchell Ticknor	Winchell Ticknor	Box 9156 Nikolai, AK 99691
15	Bobby Esai JR.	Bobby Esai Jr.	P.O. 9101 Nikolai, AK 99691
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17	Claude W. Petruska	Claude W. Petruska	1111111111
18	Bobby W. Esai SR.	Bobby W. Esai Sr.	POB 9101 Nikolai AK 99691
19	CHRISTOPHER NIKOLAI	Christopher Nikolai	
20	Melvin S Nikolai	Melvin S Nikolai	POB 9136 Nikolai 99691
21	Deacon Nikolai	Deacon Nikolai	PO Box 9136 Nikolai 99691
22	John P. Nikolai	John P. Nikolai	PO Box 9104 Nikolai 99691

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24	DAN ESAI	Daniel Esai	PO Box 9142 NIKOLAI AK 99691
25	ANNA ALEXIA	Anna Alexia	P.O. Box Nikolai AK 99691
26	Deaphn Alexia	Deaphn Alexia	P.O. Box NIKOLAI AK 99691
27	Robert Gregory	Robert Gregory	P.O. Box 9120 Nikolai AK 99691
28	Fred Dennis	Fred Dennis	P.O. Box 9156 Nikolai AK
29	Steven D. Nikolai Sr.	Steven D. Nikolai Sr.	Box 4, Nikolai AK
30	Nick Alexia Sr	Nick Alexia Sr.	P.O. Box 9126 NIKOLAI AK
31	Agnes Tony	Agnes Tony	Box 9147 Nikolai, AK
32	PETER A. TONY	Peter A. Tony	Box 9147 NIKOLAI, AK

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34	Willie PETRUSKA	Willie Petruska	10 Box 9162 Nikolai AK 99691
35	NICK DENNIS	Nick Dennis	Box 9113 Nikolai 99691
36	Irene Nikolai	Irene Nikolai	P.O. Box 9104, Nikolai, AK, 99691
37	MIKE SABINO	Michael Sabino	P.O. Box 9114 Nikolai, AK 99691
38	Adam Nikolai	Adam Nikolai	P.O. Box 55 99691

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*Intent is to make this  
ER permanent in 3/00*

**RC 73**

*Final language 6-0-1*

Note to Publisher: When a subsection, paragraph, subparagraph, etc. is indicated by the appropriate number or letter and no text follows that symbol, then the omitted text is the same as that set out in the previous register containing the section. Amended text to be added is underlined. Amended text to be deleted is capitalized and enclosed in brackets.

**TITLE 5. FISH AND GAME**

**PART 3. GAME**

**CHAPTER 92. STATEWIDE PROVISIONS.**

**ARTICLE 5. INTENSIVE MANAGEMENT.**

5 AAC 92.125(1) is amended to read:

**5 AAC 92.125. WOLF PREDATION CONTROL IMPLEMENTATION PLAN.**

Wolf predation control implementation plans are established in the following areas:

(1) a Unit 19(D)-East wolf predation control area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(D)-East upstream from the Selatna River, but excluding the Selatna River drainage, the Black River drainage, and the Takotna River drainage upstream from the Nixon Fork drainage; in accordance with 5 AAC 92.110, the commissioner or the commissioner's designee may conduct a wolf population reduction or wolf population regulation program in the Unit 19(D)-East wolf predation control area consistent with the following control objectives, constraints, and requirements:

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(A) the objective of the program is to reverse the decline in the moose population and initiate an increase the early winter moose population to 6,000 - 8,000 with a sustainable annual harvest of 300 - 400 moose by the year 2005 [2000];

(B) when [IF] the commissioner or the commissioner's designee conducts a wolf population reduction or wolf population regulation program, the program shall be conducted in the following manner to achieve the objective of (A) of this paragraph:

(i) for up to five years beginning February [JULY] 1, 2000 [1996], the commissioner may reduce the wolf population in Unit 19(D)-East; however, the commissioner may not reduce the wolf population within the Unit 19(D)-East wolf predation control area to fewer than 20 [50] wolves; and

(ii) the commissioner shall reduce the wolf population in an efficient manner, but as safely and humanely as practical;

(iii) the board authorizes the commissioner to issue public aerial shooting permits or public land and shoot permits as a method of wolf removal;

(C) hunting and trapping of wolves by the public in Unit 19(D)-East during the term of the program may occur

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as provided in the hunting and trapping regulations set out elsewhere in this title; however, if the wolf population is reduced to 20 [50] wolves, the commissioner shall stop all taking of wolves until the wolf population increases;

(D) annually, the department shall provide to the Board of Game, at the board's fall board meeting, a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose, caribou, black bear, brown bear, and wolf populations, and recommendations for changes, if necessary, to achieve the plan's objective;

(E) justification for the program, and wildlife population and human-use information, is as follows:

(i) the Board of Game determined the moose population in Unit 19(D)-East is important for providing high levels of human consumptive use; the board established objectives for population size and annual sustained harvest of moose in Unit 19(D)-East consistent with multiple use and principles of sound conservation and management of habitat and all wildlife species in the area;

(ii) the moose population in Unit 19(D)-East contains migratory and lowland resident components;

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migratory moose move from the uplands of the Alaska Range foothills in adjacent Unit 19(C) to lowland areas in spring before calving; these moose remain in riparian and wetland areas of Unit 19(D)-East through the summer, then return to the foothills at the onset of the rut in early autumn; they are largely unavailable to local hunters during open hunting seasons;

(iii) the resident segment of the moose population is currently estimated to be 1,200 - 1,600 [2,000-2,500] moose based on [LIMITED] aerial surveys in 1999 [A STRATIFIED MOOSE POPULATION ESTIMATION SURVEY IS SCHEDULED FOR NOVEMBER 1995 TO DETERMINE THE SIZE OF THE RESIDENT MOOSE POPULATION IN UNIT 19(D) EAST WITH A MEASURE OF STATISTICAL PRECISION];

(iv) moose hunting seasons and bag limits are [HAVE BECOME PROGRESSIVELY] more restrictive than in [SINCE] the mid-1970s; currently, the season is open for 37 [25] days in August and September and 31 days in December with a bag limit of 1 bull for resident hunters only; aircraft may not be used for hunting moose in most of the area, so few moose are taken by hunters residing outside the area; harvest by [LOCAL] subsistence hunters in Unit 19(D)-East is estimated to

be about 80-100 moose per year; this is less than half of the desired harvest level;

(v) habitat quality in Unit 19(D)-East is not currently a limiting factor; wildfires are common and fire suppression efforts are limited; moose densities are currently estimated at approximately 0.3 moose per square mile; all indications are that habitat in this area is easily capable of sustaining 3 to 4 times the present level of the moose population; further efforts to increase moose populations through habitat manipulation would be of little value;

(vi) black and brown bear densities have not been estimated, but are thought to be [RELATIVELY] low to moderate; the impacts of bear predation on moose are thought to be moderate [HAVE NOT BEEN MEASURED];

(vii) the wolf population in Unit 19(D)-East was estimated using an intensive aerial survey in February 1994; the population in a 5,000 square mile portion of Unit 19(D)-East was estimated at 44-66 [163.5+/-20.4] wolves in 1997; this is approximately 0.9-1.3 [3.1] wolves per 100 square miles [THE EXTRAPOLATED WOLF POPULATION FOR THE ENTIRE AREA IS ABOUT 228 WOLVES; ANNUAL REPORTED HARVEST OF WOLVES IN THE AREA AVERAGED 16.2 OVER THE PAST FIVE YEARS AND IS DECLINING; THIS

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IS WELL BELOW THE SUSTAINABLE LEVEL FOR A POPULATION  
OF OVER 200 WOLVES];

(viii) available moose and wolf population estimates suggest the current moose-to-wolf ratio is between 18-1 and 36-1, and may be substantially lower if anecdotal evidence on the present size of the wolf population is correct [LESS THAN 10-1]; with limited numbers of caribou and other prey in Unit 19(D)-East, wolf predation rates on resident moose are high; moose [NUMBERS] can be expected to persist at low densities with little expectation of increase [TO CONTINUE TO DECLINE RAPIDLY] unless the moose-to-wolf ratio changes substantially;

(ix) Several severe [SIX OF THE PREVIOUS EIGHT] winters in the late 1980s and early 1990s [HAVE BEEN RELATIVELY SEVERE WITH DEEP, LONG-LASTING SNOW; SEVERE WINTERS] have contributed to the moose population decline by reducing forage availability and increasing vulnerability of moose to wolves;

(x) hunting and trapping of wolves in the area have not exceeded [IS BELOW] sustainable levels; the department can continue [INCREASE] trapper education efforts in local villages, but previous trapper education programs in the area had no measurable

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effect on harvest; economic factors are a major  
obstacle to reducing wolf numbers through hunting and  
trapping; if the wolf population is to be reduced to  
achieve prey population objectives, measures beyond  
normal hunting and [SPORT] trapping will have to be  
employed;

...

(Eff. 10/1/93, Register 127; am 8/18/95, Register 135; am  
7/1/96, Register 138; add'l am 7/1/96, Register 138; am  
7/27/97, Register 143; er / /2000, Register )

Authority: AS 16.05.255

AS 16.05.270

**5 AAC 92.125. WOLF PREDATION CONTROL IMPLEMENTATION PLAN.** Wolf predation control implementation plans are established in the following areas:

(1) a Unit 19(D)-East wolf predation control area is established and consists of those portions of the Kuskokwim River drainage within Unit 19(D)-East upstream from the Selatna River, but excluding the Selatna River drainage, the Black River drainage, and the Takotna River drainage upstream from the Nixon Fork drainage; in accordance with 5 AAC 92.110, the commissioner or the commissioner's designee may conduct a wolf population reduction or wolf population regulation program in the Unit 19(D)-East wolf predation control area consistent with the following control objectives, constraints, and requirements:

(A) the objective of the program is to reverse the decline in the moose population and increase the early winter moose population to 6,000 — 8,000 with a sustainable annual harvest of 300 — 400 moose by the year 2000;

(B) if the commissioner or the commissioner's designee conducts a wolf population reduction or wolf population regulation program, the program shall be conducted in the following manner to achieve the objective of (A) of this paragraph:

(i) for up to five years beginning July 1, 1996, the commissioner may reduce the wolf population in Unit 19(D)-East; however, the commissioner may not reduce the wolf population within the Unit 19(D)-East wolf predation control area to fewer than 50 wolves; and

(ii) the commissioner shall reduce the wolf population in an efficient manner, but as safely and humanely as practical;

(C) hunting and trapping of wolves by the public in Unit 19(D)-East during the term of the program may occur as provided

in the hunting and trapping regulations set out elsewhere in this title; however, if the wolf population is reduced to 50 wolves, the commissioner shall stop all taking of wolves until the wolf population increases;

(D) annually, the department shall provide to the Board of Game, at the board's fall board meeting, a report of program activities conducted during the preceding 12 months, including implementation activities, the status of moose, caribou, black bear, brown bear, and wolf populations, and recommendations for changes, if necessary, to achieve the plan's objective;

(E) justification for the program, and wildlife population and human-use information, is as follows:

(i) the Board of Game determined the moose population in Unit 19(D)-East is important for providing high levels of human consumptive use; the board established objectives for population size and annual sustained harvest of moose in Unit 19(D)-East consistent with multiple use and principles of sound conservation and management of habitat and all wildlife species in the area;

(ii) the moose population in Unit 19(D)-East contains migratory and lowland resident components; migratory moose move from the uplands of the Alaska Range foothills in adjacent Unit 19(C) to lowland areas in spring before calving; these moose remain in riparian and wetland areas of Unit 19(D)-East through the summer, then return to the foothills at the onset of the rut in early autumn; they are largely unavailable to local hunters during open hunting seasons;

(iii) the resident segment of the moose population is currently estimated to be 2,000 — 2,500 moose based on limited aerial surveys; a stratified moose population estimation survey is scheduled for November 1995 to determine the size of the resident moose population in Unit 19(D)-East with a measure of statistical precision;

(iv) moose hunting seasons and bag limits have become progressively more restrictive since the mid-1970s; currently, the season is open for 25 days in September and 31 days in December with a bag limit of 1 bull for resident hunters only; aircraft may not be used for hunting moose in most of the area, so few moose are taken by hunters residing outside the area; harvest by local subsistence hunters in Unit 19(D)-East is estimated to be about 100 moose per year; this is less than half of the desired harvest level;

(v) habitat quality in Unit 19(D)-East is not currently a limiting factor; wildfires are common and fire suppression efforts are limited; further efforts to increase moose populations through habitat manipulation would be of little value;

(vi) black and brown bear densities have not been estimated, but are thought to be relatively low; the impacts of bear predation on moose have not been measured;

(vii) the wolf population in Unit 19(D)-East was estimated using an intensive aerial survey in February 1994; the population in a 5,000 square mile portion of Unit 19(D)-East was estimated at  $163.5 \pm 20.4$  wolves; this is approximately 3.1 wolves per 100 square miles; the extrapolated wolf population for the entire area is about 228 wolves; annual reported harvest of wolves in the area averaged 16.2 over the past five years and is declining; this is well below the sustainable level for a population of over 200 wolves;

(viii) available moose and wolf population estimates suggest the current moose-to-wolf ratio is less than 10-1; with limited numbers of caribou and other prey in Unit 19(D)-East, wolf predation rates on resident moose are high; moose numbers can be expected to continue to decline rapidly unless the moose-to-wolf ratio changes substantially;

(ix) six of the previous eight winters have been relatively severe, with deep, long-lasting snow; these severe winters have contributed to the moose population decline by reducing forage availability and increasing vulnerability of moose to wolves;

(x) hunting and trapping of wolves in the area is below sustainable levels; the department can increase trapper education efforts in local villages, but previous trapper education programs in the area had no measurable effect on harvest; economic factors are a major obstacle to reducing wolf numbers through hunting and trapping; if the wolf population is to be reduced to achieve prey population objectives, measures beyond normal hunting and sport trapping will have to be employed:

(2) a Unit 20(A) wolf predation control area is established and consists of Unit 20(A) except for the following areas: the Fort Wainwright and Fort Greely Military Reservations, Clear Air Force Station, and that portion of Unit 20(A) south and west of a line beginning at the confluence of Lignite Creek and the Nenana River, then along the north bank of Lignite Creek to the mouth of Sanderson Creek, then in a direct line to the top of Dora Peak, then in a direct line to the top of Mount Fellows, then in a direct line to the top of Pyramid Mountain, then in a direct line south to the southern boundary of Unit 20(A); in accordance with 5 AAC 92.110, the commissioner or the commissioner's designee may conduct a wolf population reduction or wolf population regulation program in the Unit 20(A) wolf predation control area consistent with the following program objectives, constraints, and requirements:

(A) the objective of the program is to reverse the decline of the Delta caribou herd and increase the mid-summer caribou popula-

TESTIMONY *RESOURCES*

To: Joint Senate/House Finance Committees

From: Alaska Trappers Association, Box 82177, Fairbanks, AK 99708

*Pete Bulst*

RE: Intensive Game Management for GMU 19D (East)

February 23, 2000

The Alaska Trappers Association fully supports the people of the Upper Kuskokwim in their poignant plea for responsible, active, intensive game management.

We find it reprehensible that Governor Knowles is playing politics with their lifestyle and food supply. We find it reprehensible that Governor Knowles continues to pander to environmentalists and Outside animal rights fanatics, at the expense of his own constituents.

In an attempt to buy himself political respite, the Governor in 1996 stated that he would approve wolf control if the plan was based on sound science, was cost efficient, and had broad public support. Apparently he thought that these conditions would never be met.

But now these conditions HAVE been met.

Sound Science? ADFG has shown the charts, graphs and models of the moose population situation if this ecological disaster is allowed to continue. They have also shown what is projected to happen if we intervene with responsible, intensive management.

TODAY'S HEARING

Post-It <sup>®</sup> Fax Note	7671	Date	2/23/00	# of pages	2
To	S/H RESOURCES		From	FAKS LIU	
On Behalf of	COMMITTEES		Co.		
Phone #			Phone #		
Fax #	465-4928		Fax #		

**Cost Efficiency?** The Governor has approved a wolf control (sterilization) boondoggle in the upper Tanana that is costing more than a MILLION DOLLARS. Thus he can hardly say with any credibility that a less costly program in the McGrath area isn't feasible.

**Broad Public Support?** Virtually all Alaskans support control efforts in 19D. Only the Outside animal rights groups, a few unreasonable local preservationists and the Governor are against restoring this moose population.

The situation in GMU 19D has been very bad; it is getting worse. The Legislature, the Department of Fish and Game biologists (as opposed to the politically-appointed officials,) and the Board of Game have all acted responsibly and done their jobs.

Only the Governor and the environmentalists on his staff are standing in the way of responsible, common sense, intensive game management for the wildlife and peoples of the Upper Kuskokwim.

Thank you for the opportunity to make our concerns known to you.

**ALASKA BOARD OF GAME**  
**POSITION ON WOLF CONTROL**  
22 February 2000

A central question underlying the wolf control debate is whether it is best to actively manage an ecosystem containing wolves. A good case can be made that in places where we harvest moose and caribou for human use, leaving predators out of the management equation may not be desirable, for people, for the predators, or for the ecosystem at large.

A common perception about wolves is that because they have fared badly worldwide, they must be near extinction in interior Alaska as well, and that any intentional mortality by people will push them over the brink. Actually, the opposite is true. Given the large areas of ideal habitat along with wolf, mobility and fecundity, it has proved difficult to reduce wolf numbers for any length of time.

The normal state of affairs in Interior Alaska is a low density of large mammals, with occasional irruptions to higher numbers. Here is the essence of how predator-prey dynamics appear to work, using moose and wolves as the best-understood example. Occasionally, conditions are favorable and moose increase until they reach a habitat limit and begin to run out of food, or bad winters place them under stress. In either case, they become more available to wolves. In response, the wolf population increases and creates an imbalance between the predators and their prey. Once moose numbers are driven down, wolves then decline through starvation and social strife such as cannibalism. Under extreme, but not particularly unusual circumstances, very low densities of predators and prey can be reached and persist for decades, as corroborated by the National Academy of Sciences report to Governor Knowles on predator management. This is the current situation in Unit 19D.

When that happens, the basal metabolism of the ecosystem shifts into low gear. It is a time of privation for scavengers, predators, and people. Such a landscape is not only short of meat it is short of viewing opportunities and key components of wilderness. As an Athabaskan elder from the Yukon testified to us, "when the moose and caribou are gone, the country dies".

It is biologically defensible to manage for minimizing the depth and duration of extreme population lows, when habitat is not the primary limiting factor and predation almost certainly is. Typically, predation has three components: people, bears and wolves. It is standard State Board of Game policy to reduce human harvest when a prey population is declining. But total cessation of hunting by itself, is almost never enough to arrest a decline. Substantially reducing brown bear populations is not desirable due to their low reproductive potential and the problems with estimating their numbers accurately. Ecosystem modeling and reproductive biology show that it is most effective and safest to manipulate wolf numbers because of their resilience. Wolves will come back quickly, even if over harvested, bears won't.

Once a low predator-prey equilibrium has been reached, wolf control is likely to succeed only if wolf populations can be greatly reduced for periods of up to a decade. Responding proactively to a predicted major decline minimizes the necessary length of the reduction period (the current situation in Unit 13). Weather and other ecosystem factors can confound predictions in random ways, and in short, outcomes can never be predicted precisely.

The long-term prognosis for Alaskan wolves depends on our public policy toward habitat. So long as "habitat" is defined for all practical purposes as "that land we haven't gotten around to developing yet", wolves and all wildlife will decline. But in places where large areas of ecologically intact country remain, wolf control done with careful consideration and attention to science can result in a more abundant life for moose, wolves and people.

Coalition: Abundant Wildlife      February 23, '00  
Joint House and Senate Resource Committee Hearings, Juneau, Alaska

Chairman: Ted Angasan

RurALCAP

AHTNA

TCC

AVCP

Bristol Bay Native Assoc.

CAWL

Ak. Trappers Association

Ak. Outdoor Council

Ak. Wildlife Conservation Association

Ak. Professional Hunters Association

Thank you for the invitation and the opportunity to speak to you today on behalf of a newly formed coalition put together for the sole purpose of initiating active/intensive management of renewable resources in the state. The Alaska Department of Fish and Game would do well to return to the business of managing wildlife instead of just solely concentrating on managing people. We have witnessed biologically sound aggressive scientific management erode and the implementation of a non-interventionist philosophy of resource management which literally allows eco systems to reach ecological disaster for people as well as animals. This "natural cycle" mentality is harming our people and our

animals in Rural Alaska. We believe that managing predators is essential to good biology. In village Alaska where heavy dependence on renewable resources exist, there is the recognition of strong linkages between subsistence needs not being met and predation. The State is responsible, by our state constitution, as keepers and managers of our natural resources and they have not done their jobs. If they had used proven historical methods, I'd be in Rural Alaska today going about my day to day activities. Predator control is needed where the resource is largely used as a subsistence source of food. The National Academy of Science Study states this. Our group supports the Wolf Predation Control Implementation Plan for Unit 19D east found under 5AAC.92.125 (1).

Many people in Rural Alaska can tell you about what it is like to go through a winter without a moose or caribou. Many can tell you about wolves now seen in villages and how that is affecting village lives, and many can tell you that Tier II does not return herds to healthy sustainable populations so that is not the solution.

Active/Intensive Management is the solution. Not only managing prey populations but predator populations as well.

I am pleased to conclude with telling you who we have secured endorsement from for Intensive/Active

Management and support for the State Board of Game's Wolf Implementation Plan for Unit 19D(east).

Alaska Federation of Natives, RuralCap, Ahtna, Inc., Tanana Chiefs Conference, AITC, BIA-Juneau Area Director, Alaska Trappers Association, Interior Alaska Airboaters Association, Fairbanks Fish and Game Advisory Committee, Tanana Valley Sportsmen's Association, Alaska Outdoor Council, Caribou Calf Protection Program, Residents of: Grayling, McGrath, Takotna, Nikolai and Telida.

As time progresses, more organizations will be signing on to our platform.

We call on the Governor today to implement the Wolf Control Program authorized by the State Board of Game in 1995 and again in 2000 and we ask the Governor to trust the judgement of village Alaskans and to trust his own Biologists.

Thank You.

Association of Village Council Presidents Inc.,  
P.O. Box 219  
Bethel, Alaska -99559-  
(907) 543 7300 (p)  
(907) 534 3596 (f)



# Fax

<b>To:</b> Donne Fleagle	<b>From:</b> James Berlin, Jr., Resource Specialist <i>JB</i>
<b>Fax:</b> (907) 465 4589	<b>Pages:</b> 2
<b>Phone:</b> (907) 543 7342	<b>Date:</b> 02/23/00
<b>Re:</b> Predator Control Support	<b>CC:</b> Myron Naneng, Alaskan Legislators <i>Myron Naneng</i>

Urgent     For Review     Please Comment     Please Reply     Please Recycle

● **Comments:** I am the Resource Specialist for the Association of Village Council Presidents, Inc. I am not able to attend this session in person, as I have another meeting that takes place at the same time as your hearing. But, I am able to send you a supporting statement in writing.

Dear Legislators:

The Association of Village Council Presidents Inc. is comprised of 56 member villages in the Southwest region of Alaska. Encompassing the Lower Kuskokwim and Yukon Delta, which covers at least ¼ of the Alaska's Federally recognized Tribes. AVCP Inc. is a non-profit Organization that is in full support of the efforts of our neighboring Game Management Unit 19(d) E in and around McGrath, at the head waters of the Kuskokwim River. To decrease the predator to prey ratio.

As Subsistence users of the Moose and Caribou in our own Game Management Unit 18, we are seeing a drastic increase of wolves killing and eating Moose and Caribou on the Yukon River, the middle Kuskokwim and the neighboring villages of Kwethluk, Eek, and Quinhagak. We do not want to allow the wolves to roam freely in and out of the villages, putting our children's safety in jeopardy. While the Governor, his administration and the Environmentalist's children or grand children who oppose predator control are at a safe distance away from these dangerous animals.

They are not to be trusted around human's, they pose a threat not only to the children, but the direct lively hood of our people, who's income average is at best below the poverty levels of our wealthy

February 23, 2000

nation that generates ¼ of its revenues from OUR lands in Alaska. It is not sound science, nor is it in the best interest of *Alaskans* to sit idle, while the wolves over populate and ultimately starve themselves out after my people have starved to death. Is that the goal of the State of Alaska? Or is it going to take the innocent life of a child for you to see that the wolves are not cute and cuddly animals who are helpless.

I encourage you to take action on behalf of the people. As you are well aware we voted the Governor Knowles into office, who refuses to take action on this very issue. Start taking wolves to keep them from starving themselves out, and the people that are True Alaskans. Outside interest groups who threaten not to allow their tourists to come to Alaska are full of it! They long to see this Great State of ours and no Environmentalist letter will stop the common people who long to see its natural beauty from coming into our State, to enjoy its vast and rich natural resources. The same drives that Mr. Knowles felt, and brought him here not too long ago. He seemed determined enough to get here, now that he is here and in a position to help the people of Alaska, why does he not take action on predator control before there is no reason for the tourist to come and see Alaska.

It is proven, by all scientific researches and studies that are in the State of Alaska's files. After the wolves over populate and kill everything, starvation follows in its wake! They always start their quest from the Head waters then go down towards the Coast, our backyard. We can not survive on CAKE! Nor can we depend on the next shipment of Groceries that far exceed our allowable spending from our limited income. It is bad enough we pay two, three or more times more than the Lower 48 residents for fuel, who enjoy the luxury of modern technology, of which might I remind you, a large portion comes from Alaskan soils.

We are not asking for the elimination of wolves, nor do we wish to wage war on anyone... We are simply asking for the Laws that govern our Fish & Game to be practiced. Prioritize Subsistence! Under ANCSA and ANILCA by which our lands were proclaimed to be Governed. Keep in mind that the Department's Board of Game has deliberated and adopted the Predator control in unit 19(d) E. If you have not heard by now, Wolves in Game Management unit 19D(e) are eating themselves now. I saw this with my own eyes, when I was there to attend the Rural Summit on Active Intensive Management from January 28<sup>th</sup> – February 3<sup>rd</sup>. They are on the brink of attacking children who are also hungry for moose and caribou, the very roots that has sustained our forefathers.



# Wrestling with the Dilemma —

## Coyotes and Pronghorn Survival in the 21st Century

BY JOHN SHEPERS  
PREDATOR AND FURBEARER BIOLOGIST, GAME BRANCH

**C**oyote and pronghorn coexisted in a predator-prey relationship for thousands of years until the arrival of settlers in western North America in the early to mid-1800s. Since both species were absent from the eastern United States, the pronghorn was not described until 1821 from a specimen obtained in North Dakota and the coyote not until 1823 from a Nebraska specimen. During the course of the nation's westward expansion, the history of these two species took very different paths.

Historical coyote population numbers are difficult to estimate since early settlers were unfamiliar with the animal and often did not distinguish it from the wolf, with which they were familiar. During the past 175 or so years, however, the coyote has prospered from its relationship with humans, expanding its range to occupy all the continental U.S., including Alaska, and south-



PHOTOGRAPHS BY MICHAEL PELLEGRINI

to Costa Rica. A conservative estimate of Arizona's current spring or breeding coyote population lies between 150,000 to 300,000 individuals, depending on environmental conditions, primarily prey abundance. By early fall, the spring population might easily double, resulting in a fall-winter coyote population of 300,000 to 600,000. The fall-winter population is then reduced by natural or unnatural means to the normal spring total. The actual size of the spring breeding population varies from year to year, as it is dependent upon prey abundance and other environmental factors.

The pronghorn has fared much worse than the coyote. Estimates of the presettlement continental population range from 30 to 60 million animals. Then, during the 1800s, pronghorn became the original American fast food, providing a major source of protein for all manner of settlers, miners, explorers, and construction workers. The great herds were also impacted by intensive farming and the introduction of livestock, particularly domestic sheep, and their associated diseases during this time. By 1925, about 100 years

postsettlement, estimates put the pronghorn population at about 30,000 individuals rangewide, a thousandfold decrease. The Arizona population was estimated at only 651 animals in 1925. By 1944, with the help of wildlife management strategies and federal Wildlife Restoration Fund dollars, the number had increased to about 7,000 individuals, a figure not far from the current estimate of 7,800 (posthunt, 1994). That the Arizona pronghorn population has not increased significantly since the mid-1940s, despite successful reintroductions into historic habitat and the removal of several hundred thousand domestic sheep from Arizona's pronghorn habitat, is a serious concern for present-day wildlife managers.

When conservationists began the journey to bring pronghorn back from near extinction, they recognized the implications of the lopsided predator-prey population ratio. Vernon Bailey in "Mammals of New Mexico" (1931) noted that "their [the pronghorn's] principal enemy has been man; but now with reduced numbers their old enemies—the coyote, wolves, bobcats and eagles—unless correspondingly reduced will be able to get most of the young," and in "Status of the Antelope Herds of Northern Arizona" (1944) Theodore Knipe observed, "I believe it has been proven to the satisfaction of all concerned that some degree of control must be continued year in and year out to keep abreast of the coyote and bobcat and even the lion." Research conducted in the past 20 years does not disagree with these observations. Nearly all investigations concerning pronghorn fawn mortality have identified predators, primarily coyotes, as the major cause of death.

On the other hand, high fawn mortality does not always result in a reduced population size. If losses of adults are low, the

pronghorn's reproductive potential permits populations to remain stable. Still, successive years of low fawn survival combined with a loss of adult animals may cause a significant decline and subsequent failure of a population. As the coyote is not dependent on the pronghorn for survival (fawns, when available, merely supply seasonal variety to the coyote's diet), a decrease in pronghorn numbers does not result in a corresponding reduction in coyotes. Thus, any hope of obtaining a natural, stable predator-prey interaction seems unlikely.

In the past, human efforts to intercede on the side of the pronghorn involved attempts to reduce the coyote population using any method available, including the wide-scale use of toxins. This method was restricted by presidential order in 1972, at which time the Environmental Protection Agency began regulating toxin use. While a number of experimental registrations permit the use of toxins to protect or recover endangered species, no toxin or predacide is registered by the EPA for protection of wildlife populations. Some evidence suggests that, when used on a large scale, predacides may have successfully reduced spring breeding populations of coyotes below their natural carrying capacity, although the coyote may be able to compensate for the gap by increasing litter size, or the gap may be filled by immigration of excess coyotes from nearby populations. These compensating mechanisms make the use of predacides effective only for short periods of time, unless they are used continuously, a practice that could create undesirable environmental consequences.

Since the banning of predacides, research has shown that reducing coyote numbers in a small area for a short period of time just prior to pronghorn fawning can allow fawns

*The technique of  
aerial coyote  
control to increase  
pronghorn fawn  
survival continues  
to be used even  
though it creates  
controversy*

to survive their first 60 days of life when most predation occurs. This tactic can be employed without the use of toxins. The idea of coyote population management in small areas is of great interest to wildlife managers, since pronghorn populations are becoming increasingly restrained and made more vulnerable by artificial barriers. Fenced railroad and fenced, paved highway rights-of-way create nearly total obstacles to pronghorn movement, denying the animals the ability to escape adverse environmental conditions.

In their report, "Pronghorn Antelope Mortality Study" (1985), D.J. Neff, R.H. Smith, and N.G. Woolsey documented a strong correlation between coyote population reduction and increased pronghorn fawn survival based on research carried out in Arizona from 1979 to 1983. The same relationship was recorded earlier by O.N. Arrington and A.E. Edwards in their Arizona study, "Predatory Control as a Factor in Antelope Management" (1951).

Severe pronghorn mortality occurred in Arizona during the winters of 1948-49 and 1967-68. During the 1967-68 storm, some northern pronghorn populations lost up to 80 percent of their numbers. The 10-day blizzard reduced the once numerous Anderson Mesa pronghorn herd east of Flagstaff to an estimated 115 individuals. Immediate steps to salvage the population included the use of toxicants to reduce the coyote population. By 1971, the herd size had increased to 481. When toxicants were prohibited in 1972, wildlife managers resorted to coyote trapping to perpetuate the increase in pronghorn numbers. In the case of the Anderson Mesa herd, however, trapping was not a workable option due to poor access, and the pronghorn population there slowly declined. So, prior to the fawning period in 1981, 1982, and 1983, aerial

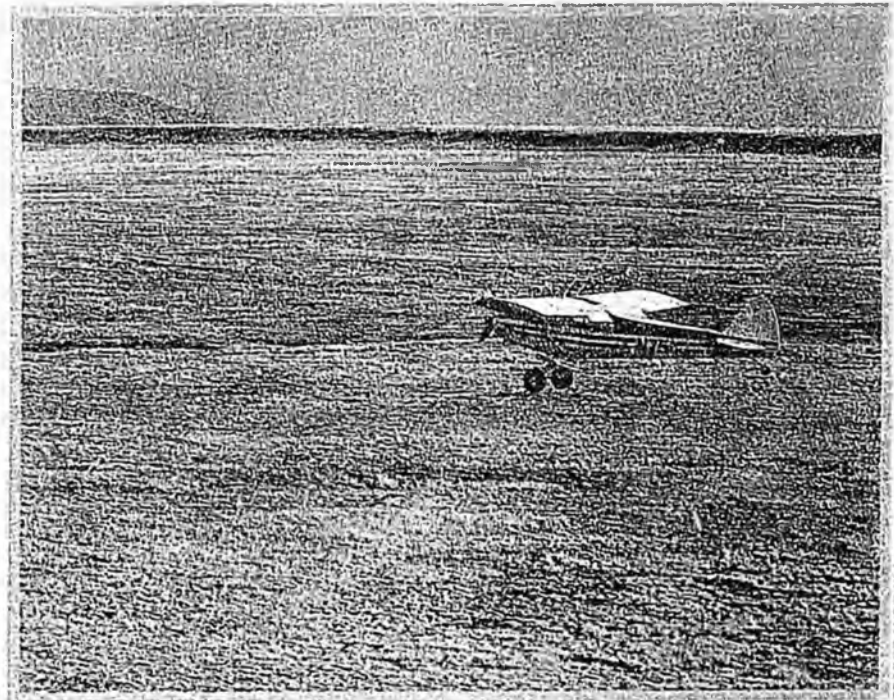
gunning was initiated in Arizona to reduce coyote numbers on Anderson Mesa. In 1983, the Anderson Mesa pronghorn population exceeded 1,000 individuals for the first time since 1960. This outcome persuaded biologists to continue the use of aerial gunning to increase fawn survival in localized pronghorn populations across the state.

Several methods of reducing a coyote population are known: capture, sterilization, and release; contraceptive drugs; and lethal removal of individual animals. Sterilization, permanent or temporary, is a very attractive option because it is nonlethal, but it is difficult to accomplish, expensive, and may result in sterilization of nontarget animals. Research currently in progress and future developments may make sterilization an effective nonlethal alternative to the elimination of individual animals, but at present it is not a practical method of coyote population management.

The technique of aerial coyote control to increase pronghorn fawn survival continues to be used even though it creates controversy. Some people oppose the

technique because they object to using aircraft to find and kill coyotes. They believe that the future survival of pronghorn depends on maintaining their habitat rather than removing their predators. An alternative proposed by opponents as a better approach is the development of habitat improvements to increase cover for pronghorn fawns. But until research verifies that habitat improvements increase fawn survival or other effective and economic control methods are developed, aerial coyote control will remain the method of choice by wildlife managers.

Due to the continued partitioning of their habitat, pronghorn populations will be even more vulnerable to catastrophic losses in the future. Reintroductions of pronghorn into vacated habitat are less desirable than recovery of remaining populations. With the future occurrence of any adverse environmental factor, the ability of wildlife managers to increase pronghorn fawn survival and recruitment and/or reduce adult pronghorn mortality may well be crucial to the survival of individual pronghorn populations. ❖



GEORGE ANDREINO

# Wolves breed fast, then disperse or die

## New research relevant to public and wolf managers

By PATRICK VALKENBURG

Everyone who has spent much time in Alaska is at least somewhat familiar with the ongoing debate on wolf management issues. Many of the arguments presented are emotionally charged and based on deeply held values. But, as prominent wolf biologists Dave Mech, Steven Fritts, and Michael Nelson wrote in a recent article in the *Journal of Wildlife Research*, "Misconceptions about wolves, both negative and positive, tend to cause people to hold extreme views about wolf protection." Much of the new information coming from wolf studies is slow to enter public debates, and often, ongoing arguments are based on old information or commonly held misconceptions of wolf biology.

In the last decade, wolf studies by the Alaska Department of Fish and Game, U.S. Fish and Wildlife Service and National Park Service have come up with some surprising new discoveries and have reconfirmed some findings from as far back as the 1960s.

Radio tracking and genetics data from the mostly untrapped Denali Park wolves show that there is little inbreeding in wolf packs and considerable interchange of wolves between packs. This appears to be true in trapped populations as well.

In addition, in Game Management Unit 20A east of Denali Park, recent work by ADF&G biologists is helping determine the importance of a discovery made from necropsy data from all over Alaska and the Yukon since the 1960s. Most (about 90 percent) female wolves older than 1 year are pregnant every year. The ADF&G research suggests that in many cases subordinate females

are not successful at raising pups, but when conditions are favorable most pups survive. Pack numbers can more than double in a single breeding season.

Conversely, wolf packs can decrease in size as a result of pup mortality and yearling dispersal in times of food shortage when there are low numbers or decreased vulnerability of prey animals. Trapping can also temporarily reduce pack size.

Very often, however, pack sizes remain relatively stable from winter to winter either because most yearlings disperse or enough wolves are trapped so some pups can be accommodated within a pack's range. Not surprisingly, in areas where wolves are heavily trapped, most wolf mortality is from trapping. In protected wolf populations, many wolves are killed by other wolves and dispersal rates are high.

This new information is very relevant to the current wolf debate which has focused on trapping. If wolf trapping and hunting are stopped or restricted, more wolves will die from other causes and more will disperse. Greater numbers of dispersing wolves would likely increase conflicts between wolves and people. Areas near population centers like Unit 20A south of Fairbanks and the lower Matanuska-Susitna valley and parts of Unit 13 are important for moose and caribou hunting. Wolf predation in these areas is probably lower because of the current level of trapping. If trapping was eliminated or restricted, demand for some form of wolf control would likely increase.

In Minnesota, public wolf trapping has been illegal for years. As a result, about 200 wolves (about 10 percent of the population)

must be killed annually to protect livestock and pets in a government control program that costs taxpayers over \$200,000. Deer numbers are also very low over large areas. In contrast, Alaska's wolf population is about four to five times larger than Minnesota's, and the 1,000 or so wolves taken per year bring in over \$250,000 to Alaska trappers. Were it not for controversy over public wolf trapping, the Minnesota program could largely be done for free by private trappers.

Many people object to trapping because of their belief that it is inhumane. For most of the smaller species of furbearers, relatively humane and selective trapping methods have been developed. For other species like lynx, which do not fight traps much, foothold traps allow trappers to release an animal unharmed if it is caught inadvertently during a closed season. For the larger canids, however, the dilemma is that quick-kill traps could potentially be dangerous to people (including trappers) and dogs. Trappers therefore rely on traditional traps and snares. Researchers and wildlife veterinarians also use the same traps and modified snares for live-catching wolves for studies. Whether done for research, control or fur trapping, there is some pain and trauma involved. To put this in perspective, though, wild wolves lead traumatic lives and are commonly seriously injured in fights with each other and with moose or die of disease and starvation. As long as the consumptive use of wolves and other wildlife is acceptable as a legitimate use of these resources, we can only do our best to reduce pain and trauma.

Other objections to wolf trapping include the catch of non-target species. Moose, caribou, ravens and other animals are occasionally caught in wolf sets. Re-

cently, the Alaska Department of Fish and Game and the Alaska Trappers Association have developed and promoted improved snare designs that will release most moose, and modern traps designed with offset jaws and pantensioning devices result in fewer non-target catches than older designs. Continued work and education will lead to improvements and adoption of the new techniques. Some occasional catch of non-target species is inevitable, but with any harvesting of natural resources, whether forests, fisheries or wildlife, some inadvertent harvest or damage occurs. Again, the ethical approach is to continue our efforts to improve selectivity.

According to Mech, Fritts, and Nelson, wolves are now more widespread than they have been in the last 30 years. As wolves repopulate much of their former range in the lower 48 states and Europe, wolf control will become more common as wolves come into conflict with people over livestock and game populations. In their opinion, a whole host of techniques, including educations, lethal control (including public trapping), translocation, compensation payments, and possibly sterilization will be needed to control wolves in the future.

Despite the seemingly endless controversy, the Alaskan system of wolf management is progressive and costs nothing to the non-hunting public. Wolves and other furbearing animals are considered valuable natural resources in Alaska, and they provide income to some people in the winter when other work is difficult to find. As long as trappers take much of the surplus wolf population, wolf control will only occasionally be needed, and the cost of wolf management will continue to be relatively low.

Patrick Valkenburg is a biologist with the Alaska Department of Fish and Game. The views expressed here are his own.

4/9/97 FAI DAILY NEWS-MINNEAPOLIS

Guest Opinion

# When freezers are empty

## Urban-rural divisions do all hunters no favors

McGrath residents face a shortage of subsistence resources even though McGrath is rural and its residents are subsistence users. Their subsistence preference has not prevented the wildlife they depend on from vanishing. McGrath hunters are the preferred "user," but they have nothing to hunt! They have lots of "preference," but what does "preference" taste like?

McGrath residents travelling far afield to hunt moose, are finding their larders bare and their traditions in jeopardy. Sen. Ted Stevens did all he could when he gave rural Alaskans a preference over urban hunters. Unfortunately, amending our Constitution to establish a "subsistence preference for and among rural residents" simply will not provide an abundance of wildlife for subsistence hunters. Establishing a preference does not protect subsistence. Preference is not opportunity.

Alaskans can do better. Instead of creating a user preference, as in the current proposal, we would have to enact: "Subsistence hunting and fishing is the preferred use of fish and wildlife in rural Alaska."

Protecting the use of wildlife for subsistence is the only way we can ensure the subsistence lifestyle. Yes, subsistence is more than hunting and fishing, but hunting is under attack. Urbane, big-city advocates of animal rights and wilderness protection are working across the nation to ban all hunting, trapping and fishing.

Protecting subsistence hunting in the Constitution makes it difficult or impossible to ban hunting. Although sport hunting would be in second place, the anti-hunters drop to last

### Guest Opinion

place.

Constitutionally protecting the personal consumption of wildlife tells wildlife managers that their job is to assure an abundance of game for subsistence hunters. All hunters would appreciate the abundance. Even non-hunters would benefit from increased levels of wildlife to look at or photograph.

Establishing hunting as a preferred use of wildlife protects subsistence hunters from future anti-hunting initiatives. No-use activists would find their efforts ruled unconstitutional except in special game sanctuaries. This would not hurt hunters or trappers. What will hurt hunters is a preference amendment that pits one hunter against another.

Most hunters forget that the Alaska National Interest Lands Conservation Act does not give rural residents the priority use of wildlife. ANILCA only grants rural residents a priority over other consumptive users of wildlife. This wording grants non-consumptive users of wildlife the top priority, a bitter irony.

Animal rights activists and others opposed to the consumptive use of wildlife often argue that hunters are the cause of wildlife shortages. They seek to shorten seasons and diminish hunting opportunity. But the shortage of moose in the McGrath area is not because there are too many hunters. In fact there are 15,000 fewer hunters in Alaska today than there were a decade ago. Neither rural nor urban hunters have caused the decline. Moose populations were decimated during severe winters. The remnants are not enough to feed the wolves and bears. Providing rural Alaskans a priority over more urban "users" of wildlife will not fill freezers in rural Alaska.

In the 1950s, active wildlife management by the federal government helped moose populations to recover. A "preference among users" does not give federal game managers any encouragement to manage for an increased number of moose. Section 816 of ANILCA would have to be amended, requiring federal wildlife managers to manage wildlife before they restricted or closed an area to subsistence hunting.

The rural resident preference, combined with the scarcity of wildlife, may be all the federal managers need to justify closing the season for McGrath hunters. Under ANILCA's "priority for rural residents" concept—Medfra, Nikolai, Takotna, Telida and other "more rural" hunters might continue hunting. But these "more rural" residents will face the same continued scarcity of moose.

The "user" preference simply does not give rural residents any hope that there will be moose to hunt. Pitting one group of hunters against another only serves to make it easy to further restrict hunting.

Dividing hunters into rural v. urban is the first step to ending hunting in Alaska. Divide and conquer. Once disenfranchised, urban hunters will not fight anti-hunting initiatives. They will not counter Alaska Wildlife Alliance's anti-hunting proposals before the Board of Game. Once urban hunters are gone, hunting will be outlawed for everyone, including rural Alaskans.

It is up to rural Alaskans to protect subsistence by asking their legislators to make hunting and fishing the preferred use in our Constitution. Only then will Alaskans be able to continue their hunting tradition. Let's ensure future generations can discover the communion between man and earth that is hunting.

Bruce Campbell of Fairbanks is a geologist, environmental consultant and former legislative aide.

Home  
By Dr. Sam Harbo:

**Environmental Sanity: -- Think Globally, Act Locally**

**A presentation by Dr. Samuel Harbo, Jr., Emeritus Professor of Wildlife Management & Biometrics University of Alaska, Fairbanks representing the Alaska Outdoor Council at the Wolf Summit Fairbanks, Alaska, January 16 - 18, 1993**

At the core of many of our environmental problems is our profligate use of cheap energy, energy that allows us to utilize distant resources in far-flung economies. No longer is consumption constrained by the sustainable limits of local resources.

The distancing of consumption from the source seems to have made us myopic, diminishing our sense of stewardship. We seem unable to visualize the effects an action taken in one geographic area might have on the environmental health of more distant areas. The current controversy is a case in point. To fully assess the environmental impacts of the proposed management plans, one must look beyond the three Alaskan areas proposed for wolf management. I am going to do so, relating the finding to our Alaskan situation.

U.S. food production requires enormous amounts of energy, with nearly all from fossil fuels. As the slide shows, the food system uses nearly 17 percent of the total U.S. energy budget. Within the food system, food processing and distribution account for 40 per cent of the energy use, reflecting the fact that no longer do we depend on local sources for our food. On average, a morsel of food travels 1300 miles from point of production to point of consumption.

Agriculture itself -- the on farm component -- is energy consumptive and energy dependent, with nearly all coming from fossil fuels. Most activities on the farm depend on energy consumptive machinery. As you can see from the slide, fertilizers and pesticides account for nearly one-third of the on farm energy use. We are using up nature's capital -- fossil fuels -- to produce and market agricultural products.

The relationship of energy used to production is mind boggling. For example, one gallon of gasoline is used per bushel of corn produced. On average, nearly 10 calories of energy are expended per calorie of food consumed. This dependence on fossil fuels to produce food cannot be sustained.

The dependence on nonrenewable energy has other serious consequences. Our farms have steadily increased in size to provide the capitalization needed for the large, expensive equipment now used in agribusiness. Individual fields have grown larger to accommodate the large, heavy equipment. In the process, we have lost the fencerows, marshes and small natural drainage systems that helped conserve soil and water and that provided wildlife habitat. Heavy equipment compacts soil and decreases soil friability. The most damaging consequence, however, has been the increase in land degradation.

The problem of land degradation is not restricted to the U.S. The amount of arable land surface suffering moderate or severe degradation in the late 1970's ranged from 27 per cent in South America to 52 per cent in Australia. And the situation has worsened.

Soil erosion in the U.S. is worse now than ever before. Current losses are 25 to 50 per cent greater than when the Soil Conservation Service was established in the 1930's. Currently, for every bushel of Iowa corn produced, 5 bushels of Iowa topsoil are lost. At current rates, by 2015 Iowa's topsoil will be no more. In Eastern Washington, 20 bushels of top soil are lost for every bushel of wheat harvested. Much of current agriculture is not sustainable; we are mining our soils.

Having larger farms and fewer farmers also causes social ramifications. No longer do we have cohesive rural communities with strong local economies based on local resources. The soybean futures on the Chicago Exchange in early September may be influenced less by the harvest prospects in the midwest than by the state of the seed bed preparation in Argentina. We have lost our sense of local economies, and with it our strong ties to the land and our sense of stewardship.

The connections between reliance on local resources, attitudes toward the environment, and energy conservation are being increasingly recognized in conservation and environmental thinking.

Cheap energy has also changed animal husbandry in the U.S. No longer do we have small operations using local resources with the objective of serving local needs. Rather, we have very large operations that cannot be supported only with local resources: operations that are designed to satisfy distant markets. The associated transportation, processing, storage and distribution are energy intensive.

An added environmental insult is that most of the large dairy and beef operations involve penned animals. No longer do we allow those plant eaters to be efficient solar energy converters. Rather we grow and harvest the hay and grains, using energy intensive and soil destroying methods, and then transport those feeds to the penned animals. And then comes the problem of concentrated animal wastes; a problem we attempt to solve using energy intensive methods.

Our reliance on energy intensive methodology is the root cause of many of our environmental problems. Air pollution, soil erosion, ozone problems and water pollution all relate to our demand for energy.

Some of our ground water pollution is directly related to agriculture, particularly our use of commercial fertilizers. My brother in the corn and soybean area of the midwest no longer drinks water directly from his 80-foot well, but distills the water first due to the dangerous levels of nitrates in solution.

What is the relevance of all this to our current topic? I will use a moose management example for Game Management Subunit 20A to show the relevance.

Subunit 20A lies immediately to the south of Fairbanks, and consists of between 16 and 17 thousand square kilometers of moose habitat. The moose population has varied greatly in size, with a high of about 23,000 animals in the early sixties and a current population of about 11,000 animals.

I will describe a plausible scenario showing the potential for Subunit 20A. A temporary reduction in wolf numbers would allow the moose population to increase. Naturally occurring wildfires and modest habitat manipulation consisting of small-scale prescription burning, could provide additional high quality habitat for moose -- habitat that could support a very productive moose population of 20,000 animals. Let's suppose we decide to maintain a wolf population of 350 wolves in 20A. In a nearly pure moose-wolf system, a ratio of one wolf to 30 moose results in nearly stable moose numbers. Subunit 20A is not a pure system. Other predators of note are black and grizzly bears. However, 20A also has other large prey -- caribou and Dall sheep. For ease of presentation I am assuming that, so far as the effects on moose numbers are concerned, the additional predator species are offset by the additional prey species. A more sophisticated analytic approach indicates that this simplistic approach is warranted.

Using the 1 wolf to 30 moose ratio, the 350 wolves could be supported by 10,500 moose, leaving 9,500 moose to produce a surplus for take by humans. In a productive situation a harvest rate of 25 per cent is sustainable. Hence, the 9,500 moose could produce a harvestable surplus of 2,375 moose annually, more than 2,000 animals greater than the current average harvest of about 350- moose. Assuming an average of 500 pounds of meat per moose, the increased harvest is more than one million pounds greater than our

current harvest. In addition, the wolf population would have increased by more than 20 per cent.

All of this could be done solely through predator management and modest habitat manipulation. Both are ecologically and environmentally safe.

Comparing the energy inputs of the 20A moose scenario with that of beef production in the Lower 48 is revealing. In the Managed Wildlife System, the integrity of the natural ecosystem and the efficiency of the system's solar energy converters -- the moose -- remain intact. The system runs almost entirely on solar energy, without significant inputs of fossil fuel energy, without tillage that leads to soil erosion, and without using fertilizers, herbicides, pesticides or growth hormones. In addition, most benefits accrue directly to the local residents, providing strong incentives to manage the system in a healthy, sustainable manner.

[In contrast,] the Managed Domestic Meat Production System is fossil fuels dependent. In most beef operations, energy intensive cropping and haying operations separate the primary producers from the primary consumers. The entire marketing effort, which includes processing, storage and distribution, also is energy intensive, since most products from such systems are destined for distant markets. Without substantial inputs of fossil fuels, fertilizers, herbicides and pesticides, the Managed Domestic Meat Production System would collapse.

>From an Alaskan conservationist's perspective, the choice of System is clear.

A closing comment about value systems is appropriate.

One of the most important and cherished attributes in our society is our cultural and value system diversity. I don't believe any single value system or viewpoint should be imposed on everyone, everywhere, at all times. It is doubly important that such not occur if elements of that value system fly in the face of environmental sanity, undermining the creed "think globally, act locally."

I also believe an ethical question is raised if individuals pursue a course of action that they know to be environmentally damaging.

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