



THE WILDLIFE SOCIETY ALASKA CHAPTER

2627 Ingra Street
Anchorage, AK 99508

3 January 2014

The Alaska Chapter of The Wildlife Society is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. Our mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

Mr. Ted Spraker, Chairman
Alaska Board of Game
c/o Boards Support Section
P.O. Box 115526
Juneau, AK 99811

Dear Mr. Spraker:

Intensive management (IM) of Alaska's ungulates, as required by state statute, is often controversial because it typically involves predator reduction. As an organization of wildlife professionals, the Alaska Chapter of The Wildlife Society has an interest in the 1994 IM statute. This is because the statute affects wildlife management decisions and influences public perceptions of wildlife managers.

Recently our organization revised our position statement on IM, which I have enclosed for your review. The revision was approved by a statewide vote of Chapter members. In our position statement we recognize that reduction of predator density is a tool that wildlife managers can use to enhance ungulate populations and harvest. We also recognize that IM, while mandated by law, must be scientifically based and professionally implemented to be effective and credible with the public. Our recommendations for meeting those goals were agreed upon by wildlife professionals who have diverse views on predator management.

Our recommendations are made in a positive vein and we offer them as constructive suggestions to address some of challenges associated with IM. Please consider the following summary of findings and recommendations that may be of special interest to the Board of Game and Commissioner of ADF&G.

- **The ADF&G Intensive Management Protocol should serve as a guide for IM programs.** The 2011 Protocol developed by ADF&G provides practical, science-based

recommendations to guide decisions regarding intensive management. The principals and guidelines in this document may be useful to the Board as it considers implementation of new IM programs and the reauthorization or revision of ongoing programs. We especially support the use of an adaptive management framework as a means to guide review and revision of ongoing programs. We also support use of defined population and harvest metrics that serve to suspend a program when objectives (or alternative measures of success) are achieved, or to terminate programs when objectives are determined to be unobtainable. Through reports recommended by the Protocol, the Board of Game and the public can evaluate outcomes of an IM program and assess opportunity costs that are incurred when ADF&G has to focus resources on IM at the expense of other wildlife programs.

- **Predator reduction is best achieved via IM programs rather than regulatory amendment of predator harvest.** We respect the Board of Game's authority to regulate harvest of predators. However, we recommend that if the Board wishes to reduce predator numbers in an area to enhance ungulate harvest, it do so through IM programs, rather than through amendment of harvest regulations for predators. An IM framework provides a better opportunity to explicitly state program objectives and to assess their feasibility. When implemented under the guidance of the ADF&G IM Protocol, an IM framework also provides a clearer means to monitor the outcome of a predator reduction program and to make revisions.
- **Codified population and harvest objectives for ungulates should be evaluated.** An IM program may be perceived as a failure if population or harvest objectives for ungulates cannot be obtained. To ensure that objectives are appropriate, we recommend that the Board, in collaboration with ADF&G biologists, review codified population and harvest goals to ensure they are attainable any time a new program is proposed or an existing program is considered for reauthorization.
- **Ensure that an increase in ungulate harvest is possible following predator reduction.** Increased harvest of ungulates after predator reduction can be important to ensure that ungulate populations do not increase to levels that result in unsustainable consumption of their forage. This may require increased harvest of females and young to slow, cease, or reverse population growth. We recommend that IM programs only be approved if an increase in ungulate harvest is feasible and Advisory Committees in the program area support harvest of antlerless animals, should that become necessary.
- **Bear control should be considered an experimental means of enhancing ungulate populations.** Although bear removal can result in increased survival of juvenile ungulates, there is less certainty regarding positive effects of bear reduction on density or harvest of adult ungulates. Furthermore, although wolf populations are likely to increase

rapidly once control efforts cease, the long-term response of bears to reduction efforts are less certain. Therefore we recommend that IM programs that involve reduction in bear densities be considered experimental and be designed to test their efficacy.

I hope that you and others on the Board find this summary and our position statement useful as you consider IM proposals. We would welcome any opportunity to discuss our position on IM more fully.

Thank you for your time and consideration.

Best regards,



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Copies to:

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