

August 15, 2023

The Honorable Secretary Deb Haaland
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Re: Pittman-Robertson Funding Contingent on States Meeting Federal Standards for Wildlife Management Required by the Act

Dear Secretary Haaland,

On September 27, 2021, the Global Indigenous Council, along with 27 other organizations and scholars, submitted a formal petition to your office seeking a public review process and eligibility determination prior to the U.S. Fish and Wildlife Service's ("FWS") funding of controversial wildlife "conservation" projects underwritten by the *Federal Aid in Wildlife Restoration Act* or *Pittman-Robertson Act*. The addition of a notice and comment period would allow the FWS to recognize the interested public and provide them with the ability to weigh in. An eligibility determination would provide a tool for the FWS to limit federal funding to states with out-of-control predator programs.

Since its submission the petitioners have not received a response, and in the meantime the FWS has continued to fund irresponsible and controversial predator-control projects. We request a meeting with the Secretary to discuss the rulemaking petition.

In a June 6, 2023 notice, the Alaska Department of Fish and Game ("ADFG") announced that during the period of May 10 to June 4, 2023, it had killed 94 brown bears including cubs, 5 black bears and 5 wolves in an action with the purported objective of increasing caribou calf recruitment for the Mulchatna herd. While the ADFG told the public that it had intended to kill between 15 and 25 brown bears, the agency inexplicably killed at least four times that many.

Ripple et al. (2019) describe the dangerous nature of Alaska's Intensive Management program. In some areas of the state, ADFG agents shoot brown bears and black bears from helicopters, snare bears and even shoot mother brown bears accompanied by cubs.¹ Wolves face similar fates, and are targeted in the controversial "Judas wolf" program in which radio-collared wolves who return to their pack enable ADFG agents to discover and eliminate the entire pack. The agency also aerial guns wolves and poisons their pups in their dens.²

Despite the ADFG's claims to the contrary, the liberalized killing of these essential large carnivores is wholly unsustainable. Ripple et al. (2019) write:

Reported kills of brown bears by hunters more than doubled during the last 30 years in a liberalized brown bear hunting area comprising 76% of the state...

Major liberalizations of hunting regulations for black bears and wolves also occurred, including expanded bag limits and extensions of seasons into times of the year when hides have little value. Even Alaska's 11 National Preserves managed by the United States National Park Service are not refugia from predator reduction regulations adopted by the state of Alaska.³

Predator-control schemes are well documented as harmful to mammalian carnivores⁴, and they rarely benefit game herd recruitment in Alaska and elsewhere.⁵ Ecologists are in consensus about the essential role top predators play in the health of ecosystems and they agree that most ecosystems have been degraded by human-caused mortality of top predators.⁶

The extinction crisis is not an abstraction; it is a clear and present danger and an impending catastrophe. The FWS is tasked with preventing extinctions, using sound science when making decisions to prevent those extinctions, and with being accountable to the entire public—not funding controversial predator-control actions for the purported benefit of a few.

For these reasons, we urge your office to again consider our petition and meet with us to discuss the issues. Grants administered under the PRA require more public scrutiny.

Thank you for your immediate attention to this issue.

Sincerely yours,

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¹ Ripple WJ et al., "Large carnivores under assault in Alaska," *PLOS Biology* 17, no. 1 (2019), <https://journals.plos.org/plosbiology/article?id=10.1371/journal.pbio.3000090>.

² Ripple WJ et al., "Large carnivores under assault in Alaska."

³ Ripple WJ et al., "Large carnivores under assault in Alaska," p. 3.

⁴ J. H. Schmidt, J. W. Burch, and M. C. MacCluskie, "Effects of Control on the Dynamics of an Adjacent Protected Wolf Population in Interior Alaska," Article, *Wildlife Monographs* 198, no. 1 (Jul 2017), <Go to ISI>://WOS:000404130600001; S. D. Miller, J. W. Schoen, and C. C. Schwartz, "Trends in brown bear reduction efforts in Alaska, 1980-2017," Article, *Ursus* 28, no. 2 (Nov 2017), <https://doi.org/10.2192/ursus-d-17-00002.1>, <Go to ISI>://WOS:000422896700002; Ripple WJ et al., "Large carnivores under assault in Alaska."

⁵ National Research Council, *Wolves, bears, and their prey in Alaska* (Washington, D.C.: National Academy Press, 1997); C. D. Mitchell et al., "Population density of Dall's sheep in Alaska: effects of predator harvest?," Article, *Mammal Research* 60, no. 1 (Jan 2015), <https://doi.org/10.1007/s13364-014-0199-4>, <Go to ISI>://WOS:000349283400004; R. D. Boertje et al., "Demography of an Increasing Caribou Herd With Restricted Wolf Control," Article, *Journal of Wildlife Management* 81, no. 3 (Apr 2017), <https://doi.org/10.1002/jwmg.21209>, <Go to ISI>://WOS:000398090600007; L. R. Prugh and S. M. Arthur, "Optimal predator management for mountain sheep conservation depends on the strength of mesopredator release," Article, *Oikos* 124, no. 9 (Sep 2015), <https://doi.org/10.1111/oik.02017>, <Go to ISI>://WOS:000360823400014; T. Trump et al., "Sustainable elk harvests in Alberta with increasing predator populations," *PLoS ONE* 17, no. 10 (2022), <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0269407>; T. J. Clark and Mark Hebblewhite, "Predator control may not increase ungulate populations in the future: A formal meta-analysis," *Journal of Applied Ecology* 58, no. 4 (2021), <https://doi.org/https://doi.org/10.1111/1365-2664.13810>, <https://besjournals.onlinelibrary.wiley.com/doi/abs/10.1111/1365-2664.13810>.

⁶ Estes JA, Terborgh J, Brashares JS, Power ME, et al. 2011. Trophic downgrading of planet earth. *Science* 333: 301-306.