

## **Department of Fish and Game**

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Mr. Rick Steiner Oasis Earth Anchorage, Alaska richard.g.steiner@gmail.com

Mr. Rick Steiner

Thank you for your letter of August 15 requesting adjustments to predator control programs. As we are both well aware, predator control has been and will no doubt continue to be controversial. Wildlife management in Alaska requires balancing what are at times conflicting public needs, opinions, and interests. The debate over whether or not predator control activities should be allowed in Alaska has received much attention over the years spanning many legislatures, governors, and Board of Game meetings.

I would first like to respond in general concerning Alaska's intensive management (IM) programs and your claim that they are not based on scientific principles (e.g., population biology, predator-prey relationships, natural mortality, etc.) and extensive research. IM is a process that starts with investigating the causes of low moose, caribou, or deer numbers, and then involves steps to increase those numbers where possible. Under IM, management can include habitat improvement and predator control. In all cases, we are committed to sustainable management of all wildlife populations, including bears and wolves as well as moose, caribou, and deer.

Intensive management—indeed all management—is not science. Management is informed by science. Scientific understanding of predator prey relationships is the basis for federal and state predator management programs around the world. The science behind Alaska's intensive management efforts, including those that involve predator control, is extensive and ever advancing. The predation control programs in place are supported by scientific evidence and biologists are always gathering more. If evidence shows a program ineffective, department biologists are the first to recommend ceasing it. For links to some references on this subject, visit: <a href="https://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.research">www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.research</a>

Now to your three specific requests: replace lethal predator control with non-lethal methods, stop using radio collars to locate wolves for control, and prohibit all intensive management within five miles of federal conservation units. At this time, I am not inclined to adopt these suggestions, and I'll briefly explain why.

First, regarding non-lethal methods such as translocation and sterilization, your letter mentions the belief that IM was successfully implemented using non-lethal methods during the administration of Governor Knowles. In fact, evidence collected on those efforts suggests otherwise: all of the wolves translocated died within a short period and other dispersing wolves eventually replaced the pairs of remaining sterilized wolves. Bears were translocated in Unit 19D for several years and it showed very limited success, in part because many of the bears eventually returned, some doing so within the first year. The positive effects on the moose populations were limited and short-term. In addition, both sterilization and translocation are inefficient and very costly. Even if cost was not an issue, the truth is simply that no area of Alaska is in need of additional predators. The risk of disease transmission—particularly when considering translocating canids—only adds to the list of potential negatives when considering such a program.

Regarding the use of radio collars to locate wolves for removal, I first would note that there is only one predator control program that has used this method in Alaska. The Board of Game approved this method because it is an efficient way to take wolves in an area where wolves are difficult to locate. It has been used in other jurisdictions by both state and federal governments, including in Washington and Idaho, to locate wolf packs that have preyed on livestock. The technique is intended to quickly, effectively, and humanely kill wolves to achieve the objectives as efficiently as possible.

Finally, regarding prohibiting IM on lands within five miles of a federal conservation unit, federal lands already comprise over 60% of Alaska. Expanding the borders of federal units by five miles would be a substantial reduction in state land where this could take place.

In closing, I want to thank you for your letter and for your efforts and the efforts of all the signatories on behalf of wildlife. I respect your passion and opinions and sincerely thank you for all you do to benefit Alaska's resources.

Sincerely,

Sam Cotten Commissioner

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