

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

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October 5, 2009

Senator Lisa Murkowski
709 Hart Senate Building
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Dear Senator Murkowski:

The Citizens' Advisory Commission on Federal Areas opposes passage of H.R. 3381, the *Protect America's Wildlife Act of 2009* and its companion bill, S. 1535. The restrictions proposed on the use of aircraft to conduct predator control activities would significantly impact the ability of the State of Alaska to implement its wildlife management program. The proposed legislation will encroach on the rights and responsibilities of the state to fully manage both predator and prey wildlife populations through the Alaska Board of Game and the Alaska Department of Fish and Game (ADF&G).

The controversies surrounding proactive management and control of wildlife populations, particularly that involving lethal methods, are widely known. Alaska's predator control program is debated extensively on both a state and national level. While we understand this is an emotional issue for many people, it is essential to examine it as objectively as possible. Such an examination is poorly served by the inaccurate and misleading statements made by the bills' sponsors.

For example, in introducing H.R. 3381, the bill's primary sponsor makes the claim that the "state continues to allow moose and caribou hunting by out-of-state hunters and non-local resident hunters in the same regions they claim airborne wolf hunting is needed to boost moose and caribou populations." (*Congressional Record*, July 29, 2009). In fact, according to ADF&G, in all of the active predator control areas, moose hunting has become increasingly more restrictive in the last 10 to 20 years. The Board typically restricts harvest of moose and caribou before initiating an intensive management program in an area. In the active control areas, nonresident hunting is restricted or has been eliminated by the Board of Game, as required by the state subsistence law. It also liberalizes hunting seasons and bag limits for wolves, brown bear and black bear. The Board is also required by law to establish predator and prey population objectives before an intensive management program can be implemented. Most importantly, no intensive management program can be implemented without an extensive public process.

Throughout the nation, Department of the Interior agencies such as the National Park Service and the U.S. Fish and Wildlife Service regularly conduct wildlife population control programs on lands under their management. The agencies implement programs in park and refuge units to eliminate exotic species that damage habitat and compete with native species. In other units, expanding native wildlife populations are controlled by various methods, including lethal removal, to protect habitat and sensitive or threatened plant and animal species.

There are a number of federal and state wildlife management programs that involve killing of animals to achieve management goals for both predator and prey species. Predator control, often involving use of aircraft, by state and federal agencies to reduce predation on domestic livestock is also common. Every effort is made to harvest animals in the most efficient and humane way possible when conducting these programs. In Alaska, experience has shown that the use of aircraft is the most efficient and effective means of predator control. We should note that other management techniques such as sterilization, trapping, and relocation are also employed to manage predators.

The sponsors and supporters of this legislation consistently attempt to mislead the public by portraying the State of Alaska's predator management program as some type of unethical hunting practice which violates rules of fair chase and sportsmanship. In her statement introducing S. 1535, the primary sponsor makes this specious argument. No program of this type, including the State of Alaska's program, constitutes hunting and no reasonable or informed person contends that it does. Unlike hunting activities, these control programs are directed management actions with no requirement for fair chase.

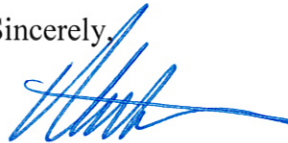
Both H.R. 3381 and S. 1535 would prohibit use of aircraft to take wolf, bear or wolverine unless it is determined that a biological emergency is imminent and all other means to prevent the biological emergency, including stopping regulated harvest, have been implemented. The obvious problem with waiting until a biological emergency is imminent before taking action is that more severe measures will be required than if a more proactive approach is used. If moose or caribou populations are allowed to decline to "emergency" levels it can take many years before they recover to sustainable levels. Initiating an action to correct an identified problem before an emergency situation exists represents sound and responsible wildlife management.

We note that the proposed restrictions do not apply to use of aircraft to conduct management programs directed at reducing predation on domestic livestock. While some people also find these programs objectionable, they are necessary to help reduce the significant economic loss suffered by farmers and ranchers each year from predation of sheep, cattle and other domestic livestock. In Alaska, where domestic livestock is limited both in numbers and availability, many residents are widely dependent on moose and caribou for food. This dependence is recognized in both State and Federal subsistence laws. Maintaining a balance between predator and prey populations through intensive management activities when necessary in selected areas helps maintain sustainable populations for use by subsistence and other users. This action is not significantly different than reducing predator populations to prevent livestock losses for farmers and ranchers.

Another key provision in both bills would require that only an officer or employee of a state or federal wildlife agency be authorized to use aircraft for predator control. Under the current State of Alaska program individuals are carefully screened and, if qualified, are permitted by ADF&G to participate in airborne predator control activities. Selected individuals act as agents for the state which meets the requirements of the federal Airborne Hunting Act. Prohibiting these individuals, who operate at their own expense, from functioning as agents of the state is merely intended to further thwart Alaska's intensive management program.

The State of Alaska, under its Constitution, is required to manage its natural resources for the maximum benefit of the people under the principle of sustained yield. This is neither an easy nor uncomplicated mandate to meet, but one which the State Board of Game and the Department of Fish and Game have done quite competently through 50 years of statehood. Passage of this legislation would make the job significantly more difficult. This Commission respectfully urges you to oppose this proposed legislation.

Sincerely,



Rick Schikora
Chairman

Cc: Governor Sean Parnell
Secretary of the Interior Ken Salazar
Secretary of Agriculture Tom Vilsack