

STATE OF ALASKA

CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

SEAN PARNELL, Governor

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January 31, 2011

Mr. David Allen
GAP Solutions, Inc.
Unimak Caribou Herd Environmental Assessment
P.O. Box 2026
Pocatello, ID 83206-2026

Dear Mr. Allen:

The Citizens' Advisory Commission on Federal Areas has reviewed the *Management Alternatives for the Unimak Island Caribou Herd Environmental Assessment*. We offer the following comments for consideration by the U.S. Fish and Wildlife Service as the agency makes a final decision on how to prevent the continued decline and possible loss of the Unimak Island caribou herd (UCH)

The Commission strongly supports implementation of Alternative B – *Selective Predator Management on the Calving Grounds and Calf Mortality Study with Helicopter Support*. This is essentially the same action proposed by the Alaska Department of Fish and Game in Spring 2010. Unfortunately, the department was unable to implement that action due to management concerns by the Service. Because of the seriousness of the situation at that time, the Commission urged the Secretary of the Interior to intervene and declare an environmental emergency under the Department's NEPA regulations. The Secretary failed to act, resulting in the loss of most of last year's calves and the continuing decline of the UCH.

We are pleased that the Service has decided to cooperate with the ADF&G on preparing this environmental assessment and in evaluating a range of alternatives. This kind of cooperative effort, which recognizes the respective authorities of both the Service and ADF&G, is the most practical means of addressing a management situation such as the serious decline in the UCH.

We fully agree with the Service's determination that the ADF&G proposed action to conduct predator control is necessary. An examination of the four alternatives indicates that Alternative B provides the most effective means to actively manage the UCH by implementing selective predator control. According to the ADF&G, use of helicopters to selectively shoot wolves responsible for killing caribou calves has the highest probability of increasing calf recruitment. In addition, this alternative would include supplementing bulls to the UCH from the Southern Alaska Peninsula Caribou Herd to improve bull to cow ratios and increase pregnancy rates. Alternative B also is the alternative that best complies with Service policy for Wilderness

Stewardship. *Wilderness Stewardship Policy 610 FW 2*, Section 2.2 provides guidance for control of predation in wilderness. This policy states:

"We [USFWS] will direct control at the individual animal(s) causing the problem using the method least likely to adversely impact nontarget species and wilderness visitors."

Use of helicopters is a proven method for selective removal of wolves because it allow the targeting of individual animals and is unlikely to impact nontarget species. Use of helicopters will also reduce the length of time for any predator control action and result in fewer impacts to wilderness visitors.

Alternative A, the no action alternative, would not reverse the continuing decline of the UCH. It is likely that caribou would be extirpated from Unimak Island if this alternative is adopted. The Alaska Maritime National Wildlife Refuge was created by ANILCA for the following purposes:

"to conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to marine mammals, marine birds and other migratory birds, the marine resources upon which they rely, bears, caribou and other mammals." (Section 303(1)(B)(i)) and

"(iii) to provide, in a manner consistent with the purposes set forth in subparagraph (i) and (ii), the opportunity for continued subsistence use by local residents."

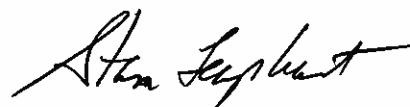
Because conservation of caribou is specifically listed as one of the purposes of the refuge, not preventing the continuing decline or possible loss of the UCH would be inconsistent with the purposes of the refuge and would not meet the Service's requirement to provide for continued subsistence use by local residents.

While Alternatives C and D have some potential for success, they would be less effective than Alternative B because they depend on use of fixed wing aircraft and/or ground based teams to take wolves. Helicopters decrease the amount of time needed to take wolves and allow for greater efficiency and selectivity in culling those wolves responsible for calf mortality.

The Commission supports the decision to take the actions needed to reverse the steep decline in the UCH. The remaining decision on how to support that action should be based on the alternative that best accomplishes that. To that end the Service should select Alternative B.

Finally, we encourage the Service to continue its cooperation with the ADF&G as this project is implemented.

Sincerely,



Stan Leaphart
Executive Director