

THE WILDLIFE SOCIETY

ALASKA CHAPTER

POSITION STATEMENT OF

THE ALASKA CHAPTER OF THE WILDLIFE SOCIETY ON

ALASKA STATUTES, TITLE 16.05.255 (e-g) (INTENSIVE MANAGEMENT OF BIG GAME) AND AMENDMENTS

INTRODUCTION

The Wildlife Society is an international professional organization of wildlife researchers, enforcement personnel, and managers dedicated to the sound stewardship of wildlife resources and the environments upon which wildlife and humans depend. The Alaska Chapter is an affiliate organization of over 300 wildlife professionals living and working in Alaska. Most Chapter members are wildlife biologists for state, federal, private, or academic institutions.

The Alaska Chapter adopts position statements on important wildlife management issues in the State. Our purpose for this position statement is to identify concerns about AS 16.05.255 (e-g), and to recommend appropriate amendments that would reconcile the law with sound wildlife management practices.

BACKGROUND

During its 1994 session, the Alaska Legislature passed HCS CSSB 77, "An Act Relating to the Powers of the Board of Game and to Intensive Management of Big Game to Achieve Higher Sustained Yield for Human Harvest." The law was incorporated into Alaska Statutes, Title 16.05.255 (e), (f), and (9). The original legislation found that... *providing for high levels of harvest for human consumptive use in accordance with the sustained yield principle is the highest and best use of identified big game populations in most areas of the state, and the big game prey populations should be managed appropriately.* AS 16.05.255(e) states that *The Board of Game shall adopt regulations to provide for intensive management to restore the abundance or productivity of identified big game populations as necessary to achieve human consumptive use goals of the board in an area where the board has determined that (1) consumptive use of the big game prey population is a preferred use; (2) depletion of the big game prey population or reduction of productivity has occurred and may result in a significant reduction in the allowable human harvest of the population; and (3) enhancement of abundance or productivity of the big game prey population is feasibly achievable utilizing recognized and prudent active management techniques.* Part (f) of the statute states *The Board of Game may not significantly reduce the taking of an identified big game prey population by adopting regulations relating to restrictions on harvest or access to the population, or to management of the population by customary adjustments*

in seasons, bag limits, open and closed areas, methods and means, or by other customary means...unless the board has adopted regulations or scheduled for adoption at its next meeting regulations that provide for intensive management to increase the take of the population for human harvest consistent with (e) of this section This subsection does not apply if the board: (1) determines that intensive management would be (A) ineffective, based on scientific information; (B) inappropriate due to land ownership patterns; or (C) against the best interest of subsistence users; or (2) declares that a biological emergency exists and takes immediate action to protect or maintain the big game prey population in conjunction with the scheduling for adoption of those regulations that are necessary to implement (e). The statute defines "identified big game prey population" as a population of ungulates that is identified by the Board of Game and that is important for providing high levels of harvest for human consumptive use. Intensive management is defined as ...management of an identified big game prey population to enhance, extend, and develop the population to maintain high levels or provide for higher levels of human harvest, including control of predation and prescribed or planned use of fire and other habitat improvement techniques.... Implementation of this legislation will require the Board to make numerous decisions about management objectives, techniques, sustainable prey population levels and harvests, and desirable levels of productivity for prey populations.

The Chapter is concerned that AS 16.05.0255 (e-g) may restrict the flexibility of the Board of Game to manage for the variety of wildlife uses in the State. No matter how well intentioned, such prescriptions often do not have the benefit of a public planning process in which biologically supportable management objectives and acceptable management techniques to accomplish these objectives are established. In the absence of these objectives, legislatively mandated prescriptions for management, such as AS 16.05.255(e-g), seldom benefit wildlife or wildlife users in the long run.

FINDINGS

Based on our collective experience as professional wildlifers, The Alaska Chapter of The Wildlife Society finds that:

1. Alaska has a diversity of wildlife species, populations, and habitats with sufficient undeveloped land to provide a mix of human uses. Wildlife management options--ranging from intensive manipulation of populations and habitats for high levels of human harvest, to little or no manipulation--should remain flexible, and open to the checks and balances of the public process. Support for wildlife and wildlife management in general depends on the public's ability to participate in management decisions, and to maintain the diversity of human uses. Intensive management for high levels of human harvest should be one of many options for wildlife managers.
2. The restrictions on Board of Game authority to regulate taking of identified big game prey populations embodied in AS 16.05.255(e-g) are unnecessary and inappropriate for progressive wildlife management. Furthermore, these restrictions may be counterproductive by inhibiting the Board from allowing increased harvest during transient periods of relative abundance due to the

Board's inability to restrict harvest in the future when conditions beyond management control change to reduce productivity or abundance.

3. There has been no formal planning process to assist the Board of Game in identifying area-specific management objectives statewide. In some areas, the public will prefer intensive manipulation to maintain a high harvestable surplus of prey populations for human consumptive uses. In other areas the public may prefer other management objectives. Areas and "identified big game prey populations" recommended for intensive management and scientifically-derived manipulation prescriptions should be supported by the Alaska public and identified as part of a participatory planning process. Unless the process used for decision-making provides for effective participation by diverse interests, those interests disenfranchised by the process will seek to reverse decisions through litigation or political action. This will lead to further conflict and reduce the likelihood that management decisions will be consistent with biological principles. AS 16.05.0255(e-g) may reduce the opportunity for consideration of diverse views and, by reducing the Board's flexibility, make it more difficult for the Board to accommodate a wide range of interests.

Populations cannot be managed in isolation from the ecosystems in which they occur. Management focused on only a few species (e.g., moose, caribou, bears, wolves) may have unanticipated and undesirable effects on other species that may be essential components of a functioning ecosystem. The long-term productivity of the ecosystem may be adversely affected thus reducing the long-term viability of the identified big game prey population as well.

Intensive management of prey populations for maximum human harvest must address (a) all sources of mortality that may be reducing harvestable surplus and (b) methods that could be used to increase the birth rate. In some cases, increases in habitat carrying capacity through habitat manipulation may be more appropriate than reductions in mortality.

6. Habitat manipulation (e.g., prescribed burns, "let-burn" policies, logging and post-logging treatments) is an important component of an intensive management strategy. Neither the Alaska Board of Game nor the Department of Fish & Game has the land management authority to authorize these uses on other than relatively small parcels of state land where the Department co-manages with the Department of Natural Resources.

7. Prescriptions for predator reduction can have long-term and potentially irreversible consequences on the predator population if they do not account for differences among species in terms of reproductive potential. For example, most bear populations have a much lower reproductive rate than corresponding wolf populations. Reductions in bear populations would have longer-term and more uncertain consequences to bears than proportional reductions in wolf populations would have to wolves.

RECOMMENDATIONS

Therefore, The Alaska Chapter of The Wildlife Society recommends that:

1. The intent of this legislation should be to ensure than intensive management of wildlife populations for the benefit of human consumptive uses is one of many legitimate, beneficial, and legal options in an enlightened and progressive wildlife management program to be carried out in a scientifically sound manner. Therefore, we recommend the following amendment [*NOTE: Deletions are bracketed; suggested is text underlined*] to Section 1 of the enabling legislation:

"Section 1. LEGISLATIVE FINDINGS. The legislature finds that providing for high levels of harvest for human consumptive use in accordance with the sustained yield principle is the [highest and best] the preferred use of [identified] big game prey populations in [most] appropriately identified areas of the state and that those identified big game prey populations should be managed accordingly."

2. The Legislature direct the Board of Game and the Department of Fish & Game to conduct a public planning process throughout the state to identify: (a) area-specific management objectives for populations and ecosystems and (b) management options acceptable to the public for meeting these objectives. The actual prescription for each area should be based on the most current scientific information, be sensitive to local concerns identified in the planning process, and include objective measures of success.

3. The Legislature direct the Departments of Natural Resources and Fish & Game to develop integrated resource management plans that include methods to manipulate habitat to meet management objectives formulated in the area-specific plan. In areas of state land specifically identified for intensive management the legislature should invest the Department of Fish & Game and Board of Game with the authority to implement intensive habitat management techniques. On non-state lands, the Department of Fish & Game should be encouraged to establish cooperative efforts with the land manager to intensively manipulate habitats and populations.

4. In those situations where predator reductions are appropriate populations of all predator species should be managed for long-term viability. This position is consistent with the Chapter's January 1993 policy statement on wolf management in Alaska. The Chapter recognized that under certain circumstances control of wolf numbers can be an effective wildlife management technique as long as it is confined to localized areas, is based on sound science and public support, and is evaluated for effectiveness. Similar criteria should be applied to programs to reduce abundance of other predators.