

RC012



Kachemak Bay Conservation Society
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January 4, 2017

To the Board of Game Members:

We appreciate the opportunity to comment on the Agenda for the January 6-9, 2017 meetings of the Board of Game (BOG). Please accept these late filed comments as we were not aware earlier of the ACR generated additions to the meeting agenda.

We oppose and urge you to reject ACR generated Proposal 155 to Renew Unit 15C Intensive Management Program. First, this agenda change does not meet the requirements established by 5 AAC 92.005 for amending the BOG meeting agenda. The regulation provides that an agenda change request is not intended to address proposals that could have been submitted by the deadline scheduled for submitting proposals. Given that the regulation in question has existed since 2012, the Proposal 155 could, and should, have been added to the agenda prior to the scheduling deadline. We are not aware of new data available in the last few months that warrants an ACR action. This alone is good reason to reject Proposal 155.

Apparently, Proposal 155 would amend regulation 5 AAC 92.118(c) to require elimination of **ALL** wolves in Unit 15C. While the BOG may adopt regulations, it should not be adopting regulations that it has proposed from within and should not be doing so without providing adequate opportunity for public input and discussion. Consideration of a regulation amendment affecting the Kenai Peninsula should not be considered at a BOG meeting held in Bethel. This, together with the ACR procedure, serves to rob the public of its right to notice and the opportunity to be heard.

Proposal 155 should be rejected because predator control is destructive to the ecosystems we all value. The moose numbers in Unit 15C are indisputably healthy and populations are not limited by predation but by habitat and hunting (including poaching). Scientific evidence shows that predator control programs lead to trophic cascades adversely affecting subordinate species of wildlife and eventually habitat health.¹ The eradication and reintroduction of wolves in Yellowstone National Park holds lessons for Alaska in how predator control programs adversely affect ecosystems.²

Another very compelling reason for rejection of Proposal 155 is the cost to the State of the predator control program. We all recognize the fiscal emergency currently faced by the State of

¹ See, *The Wolf's Tooth: Predators, Trophic Cascades, and Biodiversity* by Christina Eisenberg

² If you are short on time, please view this brief video: https://m.youtube.com/watch?v=j_5rqik_wBI



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Alaska and the need to cut costs. The Intensive Management program, which cost the State upwards of \$5 million between 2012 - 2015,³ is one significant cost that can be eliminated.⁴

Finally, Alaska's wildlife resources are a growing economic driver and will continue to be since oil revenues have decreased. Alaskans and visitors alike expect these resources to be managed in a sustainable and respectful way for current and future generations.

Respectfully submitted,

Kachemak Bay Conservation Society
Roberta Highland, President

³ See, Anchorage Daily News Opinion by Fran Mauer, published February 25, 2016.

⁴ See, Anchorage Daily News Opinion by Vic Van Ballenberghe, published December 16, 2016.