

March 28, 2016

Sally Jewell, Secretary U.S. Department of the Interior
Daniel Ashe, Director, U.S. Fish and Wildlife Service
1849 C Street NW
Washington, DC 20240

Re: Docket FWS–R7–NWRs–2014–0005, Protecting America’s Wildlife on Alaska’s National Wildlife Refuges

Dear Secretary Jewell and Director Ashe:

On behalf of our millions of members, we, the undersigned 74 organizations, applaud the U.S. Fish and Wildlife Service’s (FWS) proposed changes to regulations governing Alaska refuges under 50 C.F.R. Part 36 as part of the proposed rule titled “Non-subsistence Take of Wildlife, and Public Participation and Closure Procedures, on National Wildlife Refuges in Alaska.”⁸¹ Fed. Reg. 887 (Jan. 8, 2016). If finalized as proposed, the new regulations would ensure that Alaska’s national refuges are managed in accordance with the National Wildlife Refuges (NWR) mandates to conserve species and habitats in their natural diversity and ensure that the biological integrity, diversity, and environmental health of the NWR system are maintained for the continued benefit of present and future generations of Americans on over 76 million acres.

The Need for Regulatory Change is Clear.

The FWS has reported that in Alaska wildlife watchers number 640,000 compared to 125,000 hunters. Wildlife watchers outnumber hunters nearly fivefold, and spend five times more (\$2 billion) than hunters (\$425 million) for wildlife recreational opportunities (U.S. Fish and Wildlife Service 2011).

Considering this, the FWS must give wildlife watchers ample consideration in its decision to protect wildlife on its lands. Most wildlife watchers want to have the unique opportunity to see bears, wolves, river otters, wolverines, bobcats and lynx in America’s national parks, preserves and refuges. Wildlife belong to everyone (Horner 2000, Jacobson et al. 2010, Nelson et al. 2011) and the majority of the general public does not support the use of federal public lands for extreme native-carnivore killing practices such as those the Alaska Board of Game (BOG) has authorized.

In the past few years, the BOG has adopted a series of scientifically indefensible regulations that include allowing black bear and grizzly bear baiting and hounding; the killing of black bears, wolves and coyotes while in their den with dependent young; aerial gunning of bears and “same-day” or “land-and-shoot” aircraft-aided hunting on NWRs.

We urge the FWS to finalize the proposed rule, prohibiting the following practices for non-subsistence hunting on Alaska NWRs:

- **Killing black bear cubs or mothers with cubs at den sites, October 15-April 30:** Resident hunters are permitted to enter den sites and drive bears out, including mothers with cubs, and kill them. The proposed rule would end this practice except for “resident hunters under customary and traditional use activities” (EA at 30).
- **Killing brown bears over bait:** Bear baiting involves intensive feeding of bears, typically weeks in advance of hunting seasons, so that the animals become accustomed to feeding in a certain area. Bait sites concentrate wildlife. Concentrations of wildlife can spread disease (including rabies) or parasites, result in intra- and inter-specific aggression (e.g., large bears killing small ones or aggression between two different species) and baits habituate bears to the scent of humans among other problems (Dunkley and Cattet 2003, Inslerman et al. 2006). Bears that become habituated to human foods become less shy and more unpredictable (Dunkley and Cattet 2003, Inslerman et al. 2006). Some baits are highly toxic or spoiled and cause animals to sicken or even die (Dunkley and Cattet 2003, Inslerman et al. 2006, Sidor 2015).

- **Trapping and killing black and brown bears with steel-jaw leghold traps or wire snares:** These cruel devices are typically placed near bait sites where the bears have been accustomed to feeding on high fat or sugary foods or rotting carcasses. Bears, particularly younger ones, struggle fiercely to escape and suffer myriad injuries (Lemieux and Czetwertynski 2006, Cattet et al. 2008). Trapped bears and non-target animals experience pain, shock and dehydration until they are killed (Harris et al. 2005, Iossa et al. 2007, Cattet et al. 2008, Proulx et al. 2015).
- **Killing wolves and coyotes during the denning season (March 1-August 9):** Hunters kill wolves and coyotes while they are in their dens with dependent young. Human persecution of wolves results in wolves producing greater amounts of cortisol (stress) and reproductive hormones (Bryan et al. 2014).
- **Killing black and brown bears from an aircraft (aerial gunning) or same day as air travel:** Shooting bears from aircraft, or spotting bears from an aircraft, landing and offloading hunters and driving the bears to the hunters, or shooting the bears near bait stations after aerial scouting them violates the principles of fair chase (Posewitz 1994).
- **Predator control on refuges in Alaska unless it is determined necessary to meet refuge purposes.** Predator control practices should never be permitted on NWR unless there is a bona fide emergency, such as the imminent loss of an “endangered” species if predator-control measures are not taken.

These are all progressive steps toward obtaining better management of Alaska’s wildlife on federally-managed lands. We fully support the FWS in these steps and urge the Service to adopt a final rule that incorporates all these provisions.

We strongly support the many positive changes proposed by the FWS and urge that those changes detailed above be included in the final regulation when it is adopted.

Sincerely,

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