

Alaska Outdoor Council

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July 23, 2007

Mr. David James, Regional Supervisor
Mr. Randy Rogers, Wildlife Planner
Division of Wildlife Conservation
Alaska Department of Fish & Game
1300 College Road
Fairbanks, AK 99701

Dear Mr. James and Mr. Rogers:

Congratulations on producing a thorough, professional, comprehensive review of circumstances relating to Wood Bison restoration in Alaska

That the proposal has come this far is certainly a tribute to Bob Stephenson's dedication to exploring and promoting the goal and vision enunciated in this review.

The Alaska Outdoor Council supports the goal and vision of the proposed wood bison restoration plan. Our view of the proposal has changed little since 1997, when President Rod Arno wrote to Mr. Bob Winer, First Chief, Beaver Village Council, that AOC supports "...the concept of reintroducing wood bison to their former range in the Yukon Flats", and that "Our primary concerns are that bison remain wild and free ranging and opportunities for nonlocal hunting be assured."

The concept of restoring wood bison to their former range is a conservation goal of the highest order in terms of ecosystem and human values.

Your review document is so thorough that there seems no need to comment on most of the materials presented. There seem to be no insurmountable technical, legal, or policy issues that would make wood bison restoration infeasible.

With the exception of two items, most of the proposed guidelines, actions, and recommendations of the Wood Bison Restoration Group (WBRAG) seem sound. However, recommendation 4, page 21, is not. To categorically eliminate the management option of predator control is illogical. Even though predation has not been identified as a problem with wood bison populations in Canada up to the present that could change; there is no assurance that predation will be of no biological significance in Alaska's wood bison restoration effort.

You are aware that although predation by grizzly bears on musk ox in the Arctic National Wildlife Refuge seemed insignificant for decades, there is a strong possibility that it became highly significant in recent years in the virtual disappearance of musk ox from ANWR. Another example is the Farewell Bison Herd, which for decades seemed virtually untouched by wolf or bear predation. Our understanding of anecdotal reports is that in recent years some bear and/or wolf predation has been occurring. We have not heard how this predation may be affecting the Farewell Bison Herd population.

The point is, of course, that predation characteristics can change, perhaps for a variety of reasons. To invest all of the time, money, and public trust and support it will take to succeed in wood bison restoration but leave it at some unknown risk by prohibiting beforehand one potentially important management strategy is unconscionable. Effective predation on bison calves alone in the early stage of restoration could seriously limit or even preclude growth of the population(s). Predation control should be permissible if it's needed to help ensure success of the restoration effort.

WBRAg recommendation 8 seems rather cosmetic. The restoration population will necessarily start small, so the gene pool will also be small. There is nothing to be done about that in the immediate future. What is more important in practice is that the small populations survive and grow. Has the Delta Bison Herd, which originated from 30+ animals, been impaired by its limited gene pool? Have transplants from that herd been impaired? Not to our knowledge.

In the early 1900's the last remaining herd of Northern elephant seals numbered 22. Convinced they were doomed, a zoologist named Townsend shot half of them for museum preservation. Today there is a well established large population, undaunted by its impoverished genetic heritage, although there is some hand-wringing about the possibility of disease susceptibility.

The issues that will make or break the wood bison restoration project are these:

1. Common use and equal access concerns. Given the discriminatory terms of the federal subsistence law as it applies on federal lands, there is a legitimate concern that in spite of their good faith support and their financial support through dedicated state and federal funds, non-rural hunters will ultimately be excluded from hunting wood bison on federal lands. The current preemption, in whole or in part, of non-rural hunters' chances to hunt musk ox in various places on federal lands demonstrates the possibilities. That funding for musk ox transplants back to mainland Alaska came from hunters nationwide was rendered irrelevant by ANILCA.

We recommend that restoration begin on the Minto Flats to minimize or avoid that problem, and to capitalize on the logistical advantages of starting there. We recommend continuing plans for Yukon Flats as well. We also recommend that the State of Alaska determine in state law that wood bison, like other Alaska bison and elk, are not subsistence species, and seek a similar determination in federal law. If those measures are unsuccessful, some sort of allocation schemes such as are discussed in the review document can be pursued.

2. Hunting opportunities for local users. Local people, regardless of who they are or where they live, always have a proprietary interest in use of local resources. In the wood bison restoration scenario on the Yukon Flats in particular, local people may well be the principle landowners of some significant amount of bison range, particularly in early stages of the project. A negotiated management plan that includes a provision for reasonable local opportunities to hunt wood bison should be pursued. Since it will be years before a restored wood bison herd is large enough to hunt, there is time for interested parties to work cooperatively on this. A successful plan could circumvent alternatives such as blanket prohibition of trespass on private lands, which could also impair local economic opportunities, or opting for the federal rural subsistence priority. Such options may be difficult to modify once in place, once people become accustomed to them and become wary of risks involved in change.

3. Funding: A significant omission in the restoration review is any data on projected costs and sources of funds. Recognition of the investment of Division funds and to what extent these funds derived from hunters nationwide is also given scant attention. The restoration project could very well compete with ongoing programs for dedicated Fish and Game funds. If the restoration project were viewed as significantly impairing research and management programs that support continued hunting of important big game species, support for the bison restoration work may be hard to come by. We recommend a serious effort to identify and solicit alternate funding, be it state, federal, or private in origin.

The wood bison restoration project should be done. The bottom line is that if there is no restoration, there is no opportunity to enhance Alaska's wildlife assemblage or to provide any benefits to people. Haggling over who might get the biggest share of benefits should not be allowed to doom the restoration.

The preparations completed by the Department have laid a firm foundation. The next phase involves not only getting the animals on the ground, but addressing the 3 issues we have outlined. We offer our help with those challenges.

Sincerely,

Richard H. Bishop,
President