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Wood Bison Environmental Review Comments
ADF&G, Division of Wildlife Conservation
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Comments on Wood Bison Restoration Environmental Review

Alaska Backcountry Hunters and Anglers (ABHA) strongly support plans to reintroduce extirpated wood bison (*Bison bison athabascæ*) into specific suitable former ranges within Alaska. We applaud the hard work, research, and efforts of the Alaska Department of Fish and Game—Wildlife Conservation Division in bringing us to this point in time when the reality of wood bison restoration is so close. We recognize the future hurdles that must be overcome in order for wood bison reintroduction to take place and urge the Department to move forward with plans to import wood bison from Canada so that disease testing and observation can occur in order to release wood bison into the wild by 2010.

ABHA is a dedicated group of Alaskan hunters and anglers committed to the conservation and stewardship of our public lands habitat and of *all* of our fish and wildlife populations for future generations. ABHA takes the position that wood bison restoration is a necessary conservation measure and “valid intervention” that will ensure the future and genetic integrity of this important (and threatened) northern bison species. We believe sustained ecosystem biodiversity to be of vital importance to habitat health and the future of all species. Restoring recently-extirpated wood bison to their former range in Alaska will benefit habitat and create more biodiversity at a time when a warming trend and increased wildfire regime in Alaska would seem to cry out for a return of these indigenous grazers.

ABHA supports Alternative A, to reintroduce wood bison to the Yukon Flats region. This area has the greatest available (and perfectly suitable) habitat and the greatest potential to support a herd large enough to maintain wood

bison genetic integrity well into the future. The Yukon Flats region also has one of the lowest moose densities in the state of Alaska and any future harvestable surplus of bison would greatly benefit the local peoples of this region. For those reasons, Alternative A is our preferred choice for relocation efforts.

However, we recognize the likely conflicts down the line that will center around allocation of any harvestable surplus of wood bison for hunters in the Yukon Flats region. The differing land owners (Doyon and USFWS) and management schemes in the Yukon Flats area will likely cause some friction between rural Alaskan hunters and non-rural Alaskan hunters and non-resident hunters. There is scarce state land in the Yukon Flats, and it is likely that the Federal Subsistence Board would limit initial hunting of wood bison on federal lands to qualified rural residents only. We don't know at this time whether Native Corporation landowners will allow non-shareholder hunter access on their lands, or charge a fee to access private lands (and just what that fee would be). For the above reasons, relocation of wood bison in the Yukon Flats region, and any future wood bison hunting opportunities there, will likely further the growing urban/rural divide and racial tensions that are festering among consumptive users across the state of Alaska.

The alternative B location for reintroduction of wood bison in the Minto Flats area, while not having as much suitable habitat as the Yukon Flats area (and thus allowing a much smaller maximum herd size), has the benefit of being comprised of mostly state lands with good access and would be under state wildlife management authority. Under state management, it is likely that any future harvestable surplus of wood bison in the Minto Flats area would be open in part for a draw hunt among all resident Alaskan hunters and even non-resident hunters.

ABHA believes that unless all stakeholders can mutually benefit from wood bison restoration that the restoration plans will become mired in conflict and controversy and legal battles that could eventually hinder wood bison conservation efforts and prevent a funding stream to pay for future management and monitoring. We ask that the Department consider relocating wood bison to both the Yukon Flats and the Minto Flats areas, either concurrently or on a differing timeline, because that option (while being much more difficult and costly initially) would likely negate any future serious allocation battles and rifts while at the same time it would create the greatest potential for wood bison conservation *and* provide the

most benefit to all stakeholders (rural and non-rural resident hunters, non-resident hunters, and non-hunters/wildlife viewers). The future economic benefits from relocation in two areas would also far outweigh the initial costs, as well as allow a broader spectrum of the public to actually see and enjoy wood bison in the wild.

If only one area is chosen for relocation efforts, however, ABHA still supports Alternative A and the Yukon Flats relocation area. If the Department decides to relocate wood bison in the Yukon Flats area, ABHA will work in future with various land owners and managers and boards and councils to try to ensure some equitable system of hunting opportunity is provided to all hunters. We will also consult with USFWS staff in an attempt to convince them that restoration of wood bison on Refuge lands is indeed compatible with the Yukon Flats National Wildlife Refuge stated purpose and intent because wood bison were in part (and relatively recently) extirpated by humans and not by climate change alone. We hope that USFWS policy in future is one that embraces wood bison restoration as part and parcel of the Yukon Flats National Wildlife Refuge purpose by recognizing that *Bison bison athabascae* are indeed (again) a part of the “natural diversity” of the Refuge. ABHA will also work in future to help garner any grant monies or SWG funds for wood bison restoration efforts.

In closing, we wish to sincerely thank ADF&G staff and the Division of Wildlife Conservation for seeing this restoration effort through to this point. In particular, we would like to personally thank ADF&G biologist Bob Stephenson (aka “Buffalo Bob”) who relentlessly pursued wood bison restoration goals over the last fifteen years even in the face of what seemed to be insurmountable odds. A return of free-ranging, disease-free wood bison to their former range in Alaska would be a conservation milestone unparalleled in modern times. We earnestly hope to see it happen.

Thank you for this opportunity to comment.

Sincerely,

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