

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

OFFICE OF THE COMMISSIONER

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Public Comments Processing

FWS-R9-IA-2008-0123

Division of Policy and Directives Management; U.S. Fish and Wildlife Service

4401 N. Fairfax Drive, Suite 222

Arlington, VA 22203

RE: FWS-R9-IA-2008-0123; RIN 1018-AI83

Dear Sirs,

I am writing on behalf of the State of Alaska regarding the Fish and Wildlife Service (Service) proposal to reclassify wood bison from endangered to threatened under the Endangered Species Act (ESA), as noticed in the Federal Register (FWS-R9-IA-2008-0123 (RIN 1018-AI83) published on February 8, 2010 (Vol. 76, No. 26 pg. 6734).

We agree that wood bison no longer warrant classification as endangered under the ESA. However, given the substantial progress that has been made in wood bison conservation in Canada, we believe that the Service should have proposed to delist, not downlist, the species. As noted in the proposed rule, there are currently almost 5,000 wood bison in seven healthy free ranging herds and a similar number in the diseased herd in Wood Buffalo National Park. These numbers represent a substantial increase from a century ago, when only a few hundred animals remained in a single herd. Given the current status and distribution of wood bison across their range, we contend that wood bison are no longer likely to become an endangered species or be threatened with extinction in the foreseeable future. As a result, the measures provided pursuant to the ESA are no longer necessary, and delisting of wood bison is now warranted.

We also note no evidence of any real benefits resulting from wood bison being listed under the ESA (which occurred as a result of the species being listed by Canada), and certainly none that match the significant negative effects that listing has imposed on an important opportunity for further progress in wood bison conservation in the United States. Conservation efforts in Canada have substantially improved the species' status in that country, but these efforts bear little or no relation to the United States listing status. Under the current status, ESA listing merely prohibits or limits the import into the U.S. of legally taken wood bison trophies, thereby reducing economic incentives to encourage additional expansion of some herds in Canada. The only other effect of ESA listing has been the creation of a critical obstacle for Alaska's proposed wood

bison restoration effort: concerns that limitations due to this unwarranted listing status would unnecessarily hamper reasonable development or other activities, despite the lack of benefit to the species. This obstacle needlessly defeats the intended purpose of the ESA, which includes assisting in the conservation and recovery of the fauna and flora of the United States.

During the last decade, the Alaska Department of Fish and Game has worked closely with the Service to clarify the status of wood bison in Alaska and to develop special regulations under Section 10(j) of the ESA. These regulations would classify wood bison in Alaska as a nonessential experimental population (NEP). Although the Alaska restoration program has wide support, concerns remain about the potential for effects on resource developments and land uses related to ESA provisions or potential litigation. These concerns continue to be the major obstacle to implementing the effort to restore this keystone herbivore to parts of its original range in Alaska.

In closing, we encourage the Service to delist wood bison and thereby remove a major obstacle to the effort to restore the species to its historic range in Alaska. Thank you for the opportunity to comment on the proposal to downlist wood bison.

If you have any questions please contact me at (907) 267-2339 or douglas.vincent-lang@alaska.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Lang", written in a cursive style.

Doug Vincent-Lang, Special Assistant to Commissioner
Alaska Department of Fish and Game

cc: Cora Campbell, Commissioner, ADF&G
Corey Rossi, Director, ADF&G
Ed Fogels, Deputy Commissioner, ADNR
Brad Meyen, Assistant Attorney General, ADOL
David James, Regional Supervisor, ADF&G