

# STATE OF ALASKA

*SEAN PARNELL, Governor*

## **CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS**

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April 11, 2011

Ms. Tina A. Campbell, Division Chief  
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

Dear Ms. Campbell:

The Citizens' Advisory Commission on Federal Areas reviewed the proposed rule and notice of a 12-month petition finding to reclassify the wood bison (76 FR 6734). The proposed rule would reclassify the wood bison from endangered to threatened under the Endangered Species Act (ESA). We offer the following comments for your consideration in finalizing the proposed rule.

The Commission agrees with the finding that classification of the wood bison as endangered under the ESA is no longer necessary. In fact, removal of the wood bison from any listing under the ESA would likely have a positive effect on wood bison populations. While this may seem contradictory, we believe there are several reasons that delisting would result in a significant increase in the number of free ranging herds and in the wood bison population overall.

It is our understanding that wood bison were originally listed as endangered under the ESA because of action taken in 1978 by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) to designate wood bison as endangered in that country. Just 10 years later wood bison populations had recovered enough to be downlisted to threatened by COSEWIC. It should be noted that since there are no free ranging herds of wood bison in the United States, listing under the ESA has had little, if any, positive effect on that recovery.

The only real impact from listing has been to deny sportsmen the opportunity to import legally harvested wood bison trophies from Canada. Delisting would add an economic incentive for allowing the expansion of some herds in Canada to support additional hunting by sportsmen from the U. S. who would then be able to import legally harvested trophies.

As the U.S. Fish & Wildlife Service is aware, the Alaska Department of Fish and Game (ADF&G) has worked for nearly 20 years to reintroduce wood bison in Alaska. One of the biggest obstacles to this effort has come from the Endangered Species Act. The ESA creates regulatory and legal problems for land management agencies, private property owners and the general public in dealing with a listed species. More than any other state in recent years, Alaska and its economy have been impacted by questionable listings under the ESA. Too often agency decisions to list species have been driven by political considerations and agendas rather than by actual biological necessity. Some organizations, by engaging in non-stop filing of petitions and serial litigation, have used the ESA primarily as a tool to prevent economic development and growth.

Many people who might otherwise support the reintroduction of wood bison in Alaska are rightfully concerned about the problems that could arise if this species remains listed. While suitable habitat on State owned land has been identified, opportunities for resource development on those lands would be reduced if wood bison remain listed. In addition, adjacent private property owners are apprehensive about the reintroduction and possible impacts to future resource development on their lands. This is a clear example of how restrictions in the ESA can work against a reintroduction effort.

We are aware that the ADF&G has submitted an application requesting the captive herd located at the Alaska Wildlife Conservation Center in Portage, Alaska be classified as a nonessential experimental population under Section 10(j) of the ESA. This Commission supports that effort and would encourage the Service to move forward quickly on approving that application. This would allow the herd to be released without negatively impacting other activities on State and private lands. However, we maintain that the best long term solution for recovery of wood bison, particularly through their reintroduction in Alaska, is a complete delisting. Alaska has an abundance of suitable wood bison habitat that could support several free ranging herds. By removing the obstacles and uncertainties caused by the ESA, the population of wood bison could increase dramatically. We encourage the Service to take the necessary steps to remove the wood bison from the list of endangered and threatened species.

Sincerely,



Stan Leaphart  
Executive Director

cc: Governor Sean Parnell  
Rep. Alan Dick – Alaska State Legislature  
Commissioner Cora Campbell, ADF&G  
Commissioner Dan Sullivan, ADNR  
Doug Vincent-Lang – ADF&G  
Ed Fogels - ADNR