



United States Department of the Interior
KENAI NATIONAL WILDLIFE REFUGE

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NWRS713-101
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March 13, 2013

Mr. Ted Spraker, Chair
Alaska Board of Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99881-5526

Dear Chairman Spraker:

The U.S. Fish and Wildlife Service (Service), Kenai National Wildlife Refuge (Refuge) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game at its March 15-19, 2013 Region II – Southcentral meeting in Kenai/Soldotna.

As you know, intensive management plans for moose for Game Management Units 15A and 15C, focused on wolf control, were approved by the Board of Game in January 2012. As previously communicated to the Board of Game, Service mandates, policy and management direction for administering the Refuge necessitate management objectives and strategies that differ from objectives of State of Alaska intensive management plans for Game Management Units 15A and 15C. Because of this, the Service will not authorize predator control on the Refuge.

A large number of proposals to be considered by the Board for the Kenai Peninsula (Game Management Units 7 and 15) at its March 2013 Region II meeting involve harvest regulations for brown bear, black bear, and wolves. The primary objective provided by proponents of these proposals is to increase black and brown bear and wolf harvests as predator control measures aimed at increasing moose populations in Game Management Units 7 and 15. Another proposal seeks to open hunting for wolves, coyote and lynx in the Refuge's Skilak Lake Wildlife Recreation Area, and another seeks to increase coyote harvests Region-wide as a predator control measure to benefit sheep hunters.

Should the Board adopt hunting regulations for bears and wolves aimed at supporting implementation of intensive management (though they may not formally be designated as such), or for other species as predator control measures, Refuge lands need to be excluded. Without action by the Board to exclude Refuge lands, the only alternative left

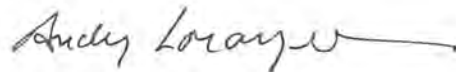
Mr. Ted Spraker, Chair

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for the Service is use of its own regulatory authorities to ensure adherence with our legal mandates, regulations, policies and management direction for the Refuge.

Comments on specific proposals are attached. Thank you for your time to review our comments on these important regulatory matters. The Service remains committed to cooperation and coordination with the Board, the Alaska Department of Fish and Game, and other State and federal agencies as we move forward with our shared management responsibilities on the Kenai Peninsula. If you have questions, please contact me at (907) 262-7021.

Sincerely,

A handwritten signature in cursive script that reads "Andy Loranger". The signature is written in dark ink and includes a horizontal line extending to the right.

Andy Loranger
Refuge Manager
Kenai National Wildlife Refuge

Attachment

ATTACHMENT

U.S. FISH AND WILDLIFE SERVICE COMMENTS ON PROPOSALS TO THE ALASKA BOARD OF GAME

March 2013 – Region II – Southcentral

Moose

Proposal 143 – Amend and Adopt

The Service supports the Alaska Department of Fish and Game's (ADF&G) proposed amendment of this proposal, to modify existing regulations to allow for take of bulls having a spike antler on at least one side or 50-inch or greater/ 3 + brow tine antlers, in their *Preliminary Recommendations, Board of Game Proposals, March 2013 – Region II*. The Service suggested this harvest management approach as an alternative for consideration by the BOG at its March 2011 meeting, as a means of alleviating conservation concerns for low bull:cow ratios while allowing a higher but sustainable level of harvest opportunity and not focusing all harvest pressure on larger, older bulls. Fall composition surveys in 2011 and 2012 have indicated improved bull:cow ratios in Game Management Units 15A and 15C, and we believe this to be a viable harvest management approach at this time.

Proposal 147 – Adopt

The Service supported a similar proposal for amending moose population objectives for Game Management Unit 15A presented by the Alaska Department of Fish and Game at the BOG's March 2011 meeting. The Service supports the general concept of aligning moose population objectives more closely with habitat conditions and carrying capacity. Large landscape fires in 1947 and 1969 were the major drivers of moose populations on the northern Kenai Peninsula during the last 60 years, and as is to be expected, carrying capacity for moose has declined substantially with ongoing forest succession and lack of large fires since the 1969 burn in this area.

Brown Bear

Proposals 153, 154, 155, 156 – Do Not Adopt

Unless modified, the Service opposes these proposals. We believe that the proposed regulatory changes governing harvest of brown bears on the Kenai Peninsula could result in unsustainable levels of harvest and overall human-caused brown bear mortality (hunting and non-hunting combined).

Given the challenges associated with monitoring and detecting changes in brown bear populations in heavily forested areas such as the Kenai Peninsula, the Service

recommends that the Board adopt an adequately conservative, strategic and science-based approach to harvest management of brown bears. While the Service believes that the current Kenai Peninsula brown bear population can support additional hunting opportunity, any new harvest management approach should ensure that the wide range of ecological and social benefits provided by a healthy brown bear population on the Kenai are maintained.

The Service recommends that the Board adopt a harvest management strategy with the following elements or components:

- Fall registration hunts in developed areas to reduce DLPs and other human-bear conflicts
- Limited entry fall and spring drawing hunts in core brown bear habitats on Kenai NWR and Chugach NF
- Maintain one bear every four regulatory years for registration and permit hunts
- Limit mortality of reproductive age female bears (both hunting and non-hunting) using quota and season dates. Determination of acceptable levels of adult female brown bear mortality must be based on the best available scientific demographic information on Kenai brown bears including population estimates and vital rates. Fall season dates should be timed from October 1 to November 30 to reduce susceptibility of adult females.
- No take of brown bears over bait.

Should the Board adopt a proposal allowing the harvest of brown bears over bait, Refuge lands need to be excluded. Legal take of animals over bait on the Refuge is limited to black bears under the terms and conditions of a Special Use Permit, and the Service intends to maintain this regulation.

The Service remains committed to coordinating closely with the ADFG on development of a biological framework to guide in-season harvest management decisions for brown bears.

Black Bear

Proposal 158 – Do Not Adopt

The Service opposes this proposal, which would increase the black bear annual bag limit from 3 bears to 5 bears for most of the Kenai Peninsula. Black bear harvests on the Kenai have increased substantially in the last decade over that of the previous 30 years, primarily in GMU 15C. While we believe the Refuge supports a healthy black bear population, we would expect that both population size and reproductive capacity has decreased over the last 20 years in GMU 15A as moose densities have declined with forest succession. The Service supported the increase of the black bear annual bag limit to 3 bears for most of the Peninsula in 2011, and harvest patterns demonstrate that hunters are provided ample hunting opportunity under the current regulations. This

proposal is clearly aimed at reducing black bear populations in support of intensive management objectives. Should the Board adopt this proposal, Refuge lands need to be excluded.

Skilak Wildlife Recreation Area (Skilak Loop Wildlife Management Area)

Proposal 159 – Do Not Adopt

The Service opposes this proposal, which would open wolf, coyote and lynx hunting in Skilak Loop. This proposal is inconsistent with the Service's management objectives for the area under its Skilak Wildlife Recreation Area Management Plan (USFWS, 2007). The Service has managed the Skilak Wildlife Recreation Area (SWRA) within the Refuge with a primary objective of providing wildlife viewing and other non-consumptive wildlife-dependent recreational opportunities since 1986. The SWRA comprises approximately 2% of the total land area within the Refuge, and it is the only area within the Refuge managed primarily to provide these non-consumptive opportunities and within which hunting for these species is not allowed. The Service has always worked closely with the ADFG, and through the Board of Game, to develop and promulgate hunting consistent with this primary management objective. Hunting in the SWRA is currently restricted to hunts for moose by permit, archery hunting for small game, and youth firearm hunting for small game. Should the Board adopt this proposal, the Service will maintain existing restrictions on hunting in the SLRA under its regulatory authorities in order to meet its longstanding public use management objectives for this area.

Wolf

Proposal 160 – Do Not Adopt

The Service opposes this proposal, which would establish a year-round open hunting season for wolves to support achieving wolf population reduction objectives established under State of Alaska Intensive Management Plans for GMUs 15A and 15C. Hunting of wolves during the reproductive and denning season has high potential to create a conservation concern for wolves on the Refuge through take of reproductive adults and associated impacts to annual reproductive success and social structure of affected packs. In addition, take during the reproductive season could reduce hunting and trapping opportunities during traditional seasons and could result in direct conflicts with other recreational users on the Refuge during a very high use period. This proposal is clearly aimed at reducing wolf populations in support of intensive management objectives. Should the Board adopt this proposal, Refuge lands need to be excluded.

Ptarmigan

Proposal 161 – Do Not Adopt

The Service opposes the component of this proposal calling for extension of the

ptarmigan season through the month of April. Extension of the season in April has high potential to negatively impact reproductive success through disturbances affecting territory establishment, pair formation and nest initiation. Based on fledgling willow ptarmigan being observed on the Kenai Peninsula by July 1, arrival on breeding territories occurs by mid-March (males) and April (females). In addition, late winter harvest mortality has been shown to be additive to natural mortality in many North American grouse populations. Should the Board adopt this proposal, Refuge lands need to be excluded.

Coyote

Proposal 175 – Do Not Adopt

The Service opposes this proposal, which would establish a year-round open hunting season for coyotes. Adoption of this proposal has potential to create a conservation concern for coyotes on the Refuge through take of reproductive adults and associated impacts of annual reproductive success. In addition, take during the reproductive season could reduce hunting and trapping opportunities during traditional seasons and could result in direct conflicts with other recreational users on the Refuge during a very high use period. This proposal is clearly a predator control measure aimed at reducing coyote populations. Should the Board adopt this proposal, Refuge lands need to be excluded.

Bear Snaring

Proposals 173 and 174 – Adopt

The Service supports these proposals. The use of traps or snares for taking of black or brown bears is currently prohibited on a statewide basis, except in specified Intensive Management Areas. The Service has previously expressed its concerns to the Board related to regulatory changes being considered that would allow the trapping or snaring of bears on national wildlife refuges in Alaska. These concerns remain and are based on the indiscriminate nature of this practice (take of adults with cubs and/or cubs and of non-target species) and resultant high potential to create conservation concerns, and on the increased risks to public safety posed by these methods.