



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 East Tudor Road
Anchorage, Alaska 99503-6199



RC 016

January 3, 2017

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Members of the Board of Game:

The National Wildlife Refuge System (NWRS) Program appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its January 6-9, 2017 meeting addressing Arctic and Western Region issues. We reviewed the proposals pertaining to the Region and offer the following comments regarding Proposals 24, 35, and 42.

Proposals 24, 42 – Permit the harvest of brown bear over bait in Units 18 and 23.

Recommendation: The NWRS Program is **neutral on the proposed regulatory change on non-Refuge lands, but opposed to the change on Refuge lands.**

The proposals would allow the practice of using bait to take brown bears in Units 18 and 23, which includes the portions of the Yukon Delta, Togiak, and Selawik National Wildlife Refuges. Regulations at 50 CFR 36.32(d)(1)(v) lists prohibited methods and means for the non-subsistence take of wildlife for non-subsistence uses on National Wildlife Refuges in Alaska, including the taking of brown bears over bait.

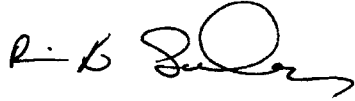
Proposal 35 – Extend the wolf harvest seasons in Units 24 – 26.

The proposal requests to extend the wolf hunting season in Units 24 – 26 to July 1 – April 20. Current wolf hunting seasons in Units 24 and 25 are Aug. 10 – May 31 and Unit 26 is Aug. 10 – Apr. 30.

Recommendation: The NWRS Program is **opposed to the extended season on Refuge lands.** Regulations at 50 CFR 36.32(d)(1)(v) lists prohibited methods and means for take of wildlife for non-subsistence uses on National Wildlife Refuges in Alaska, including the taking of wolves and coyotes from May 1 through August 9. The prohibited harvest season protects wolves and coyotes during the denning season when they and their young are vulnerable but allows the opportunity for harvest during the winter months.

Thank you for your time to review our comments on these proposals. If you have any questions, please contact Trevor Fox at 907-786-3400.

Sincerely,

A handwritten signature in black ink, appearing to read "R. B. Sullivan". The signature is fluid and cursive, with a large, prominent "O" in the last name.

Chief of Refuges
Acting