



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Togiak National Wildlife Refuge
 P.O. Box 270
 Dillingham, Alaska 99576
 Phone 907-842-1063
 Fax 907-842-5402



January 3, 2017

ATTN: Board of Game Comments
 Alaska Department of Fish and Game
 c/o Boards Support Section
 Juneau, Alaska 99811-5526

Subject: Comments on Board of Game January 2017 Proposals

Dear Members of the Board of Game:

Thank you for the opportunity to submit comments on the Board of Game proposals. Three of the proposals could potentially affect resources on Togiak Refuge.

Proposal #18 – Togiak Refuge opposes this proposal which would re-instate the brown bear tag fee exemption in GMU 18.

Rationale: This proposal is one of many regulatory changes enacted in the past 15 years that have liberalized brown bear harvest in both GMU 17 and 18. As a result of these changes, the harvest of brown bears on Togiak Refuge has increased from approximately 5-15 bears/year to 30-50 bears/year (Figure 1). At this harvest level, and based on a population estimate from 2003-2004 (Walsh et al. 2010¹) of 21-34 (95% confidence) independent bears/1000 km², we are harvesting as much as 9% annually of the estimated independent brown bear population. This is not sustainable, particularly when the unreported harvest is considered.

In recent years there have been increasing reports of a decline in brown bear numbers from Togiak Refuge users, including fishing guides, pilots, and others. This, when considered with the quantified data sources available on Togiak NWR brown bears, suggests that the population may be overharvested, and argues for a population assessment and more conservative harvest.

¹ Walsh, P., Reynolds, J., Collins, G., Russell, B., Winfree, M., and J. Denton. 2010. Application of a double-observer aerial line-transect method to estimate brown bear population density in southwestern Alaska. *Journal of Fish and Wildlife Management* 1(1)45-58.

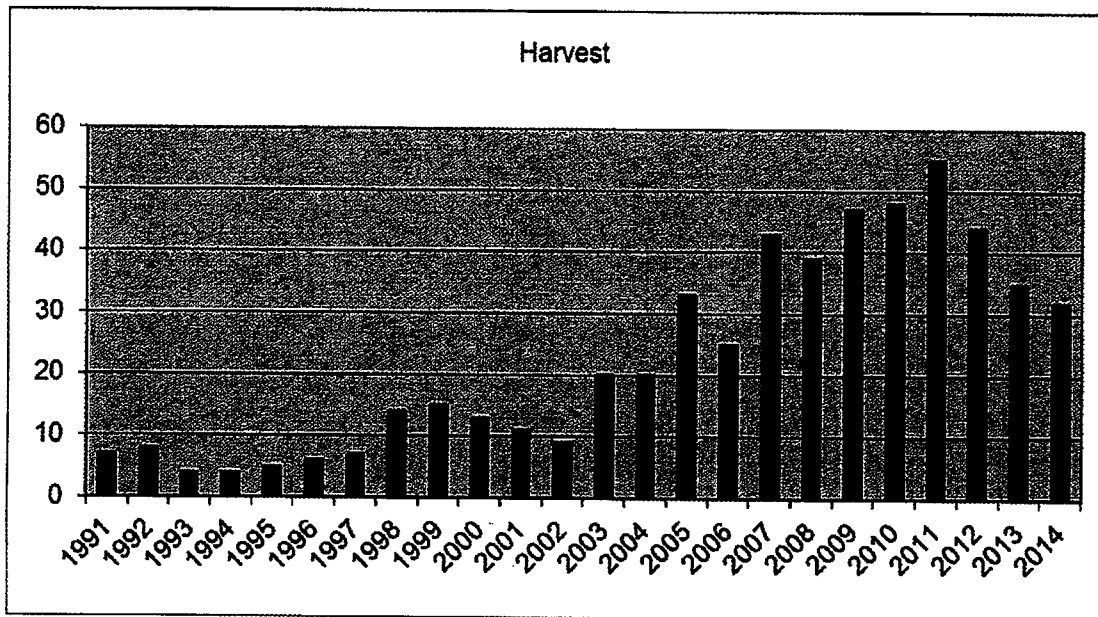


Figure 1. Brown bear harvest at Togiak National Wildlife Refuge (portions of GMU 17 and 18), 1991 through 2014.

Proposal #21 – Togiak Refuge supports the proposal to allow a state winter moose hunt in the Goodnews River Valley. We recommend starting the proposed moose hunt earlier (beginning December 1). We are also in support of the harvest of a limited number of cows.

Rationale: The moose population in the Goodnews River drainage has increased from 2 observed on the 2002 survey to a minimum count of 203 individuals in March 2012. Preliminary results of the October 2016 GSPE moose survey estimated the population in the Goodnews River drainage and areas south of the drainage to be 323 total moose with a composition of 45 bulls and 49 calves per 100 cows. If a late moose hunt began December 1, the majority of bulls would still retain their antlers allowing the numbers of moose harvested of each sex to be prescribed.

Proposal #25 – This proposal would open a nonresident drawing hunt for up to 50 bull caribou in GMUs 18 and 19. Togiak Refuge is neutral on this proposal.

Sincerely,

Patrick Walsh,
Acting Refuge Manager, Togiak National Wildlife Refuge