



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Kodiak National Wildlife Refuge  
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RC 025

25 February 2015

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 Kodiak National Wildlife Refuge appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its March 13-17, 2015 meeting addressing Southcentral Region issues. We reviewed the proposals pertaining to the Kodiak Area (GMU 8) and offer the following comments regarding Proposals 142, 143, and 191.

### **Proposal 142 - Oppose**

Current regulations allow residents and nonresidents to harvest one male Sitka black-tailed deer on the road system and three deer in the remainder of the game management area (males only between 1 August and 30 September, and either sex between 1 October and 31 December). This proposed reduction in harvest is in response to evidence of substantial over-winter mortality of deer in 2011/12.

Kodiak deer declined substantially across the Kodiak Archipelago during the winter of 2011/12. However, surveys conducted in 2014 by Refuge biologist at southern Kodiak Island indicate that deer abundances have increased 62% since 2012. As further evidence that the deer population is increasing, subsistence hunters have been reporting a decrease in hunter effort, observations of numerous fawns, and harvest of large healthy deer during the 2014 season. Moreover, this proposal would likely not influence the recovery of the deer population in GMU 8. Deer in the Kodiak area appear primarily regulated by winter conditions and typically exhibit a pattern of high and low abundances in response to periodic severe winter conditions. Hunting has not proven effective for managing deer because of the large size of the island area, restricted access to most of the area, limited number of hunters, and high expense of access to remote lands off the road system. Additionally, recovery of deer herds is promoted naturally in years immediately following major winter kill events because hunting effort decreases substantially in response to decreased availability of deer and increased cost of harvest effort.

### Proposal 143 - Oppose

Currently, "wounded" is defined by signs of blood or other signs that the bear has been hit by a hunting projectile. The proposed definition of "mortality wounded" is "any big game hit with a hunting projectile which dies or *is reasonably expected to die* as a result of the wound". The definition is inadequate because "reasonably expected to die" is undefined and subjective. The author of Proposal 143 states that the current regulation discriminates against ethical hunters, but this could be said of any hunt regulation. This proposal does not allow for easier enforcement because of the ambiguity of "reasonably expected to die". The author lists perceived dilemmas created by the current regulations that he believes are addressed by the proposal:

- 1) If a hunter wounds an animal this year and counts it against his bag limit but the animal survives and that hunter kills the same animal in a subsequent year does he NOT need to count it against his bag limit since he already did in the first year?  
*Refuge Response: Bag limit is defined by ADF&G as "the maximum number of animals of any one game species a person may take during a regulatory year". Therefore, bag limits do not carry over between years and this question is irrelevant.*
- 2) If a hunter superficially wounds an animal and considers it taken, can he be charged with wanton waste because he was unable to salvage the meat?  
*Refuge response: There is no requirement to salvage meat from brown bear harvested under current Alaska hunting regulations.*
- 3) Will a guide be tempted to tell a hunter to shoot a reasonable shot while a hunter wants to wait until he has a 100% certain shot? Thus being at odds with each other in their final goal and reducing the enjoyment of the hunt.  
*Refuge response: This proposal does not directly address this perceived dilemma between a hunter and guide.*
- 4) Will a guide allow a hunter who has superficially wounded an animal to keep hunting for only that animal and use every resource at his disposal to recover the wounded animal as is required by the guide regulations? Keeping in mind that every resource at his disposal may include bringing other assistant guides and their hunters in to help look for the wounded animal.  
*Refuge response: Under current ADF&G regulations, hunters should make every reasonable effort to retrieve and salvage game. We support this recommendation and believe that ADF&G regulations, as currently written, encourage ethical behavior by encouraging hunters to be conservative in their shot selection.*

### Proposal 191 - Oppose

The prohibition on use of felt soles in Alaskan waters was established to minimize potential introduction and establishment of economically harmful aquatic invasive species, such as New Zealand mud snail (*Potamopyrgus antipodarum*). As demonstrated in various regions of the world, including the U.S., such introductions can seriously degrade aquatic habitat of salmonids, leading to decreases in fish populations and harvest opportunity. Additionally, the felt sole restriction minimized potential for export of native Alaskan aquatic species such as Didymo alga (*Didymosphenia geminata*), that has extensively damaged salmon habitat where introduced outside its native range. Finally, alternative lightweight footwear is readily available for purchase to satisfy the same non-slip purpose of felt soles.

Thank you for your time to review our comments on these proposals. If you have any questions, please contact Bill Pyle, Supervisory Wildlife Biologist, at 907-487-0228.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anne Marie La Rosa", with a long, sweeping horizontal line extending to the right.

Anne Marie La Rosa,  
Refuge Manager

Cc: George Pappas, U.S. Fish and Wildlife Service  
Speridon Mitchell Simeonoff, Kodiak/Aleutians Subsistence Regional Advisory Council  
Lawrence Van Daele, Alaska Department of Fish and Game  
Nathan Svoboda, Alaska Department of Fish and Game