



IN REPLY REFER TO:

RC 033

United States Department of the Interior



U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503-6199

FWS/NWRS

March 16, 2016

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, Region 7, U.S. Fish and Wildlife Service appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its March 17-28, 2016 meeting addressing Statewide issues. We reviewed the proposals that could potentially affect resources on National Wildlife Refuges in Alaska and offer the following comments for Proposals 62, 64, and 94.

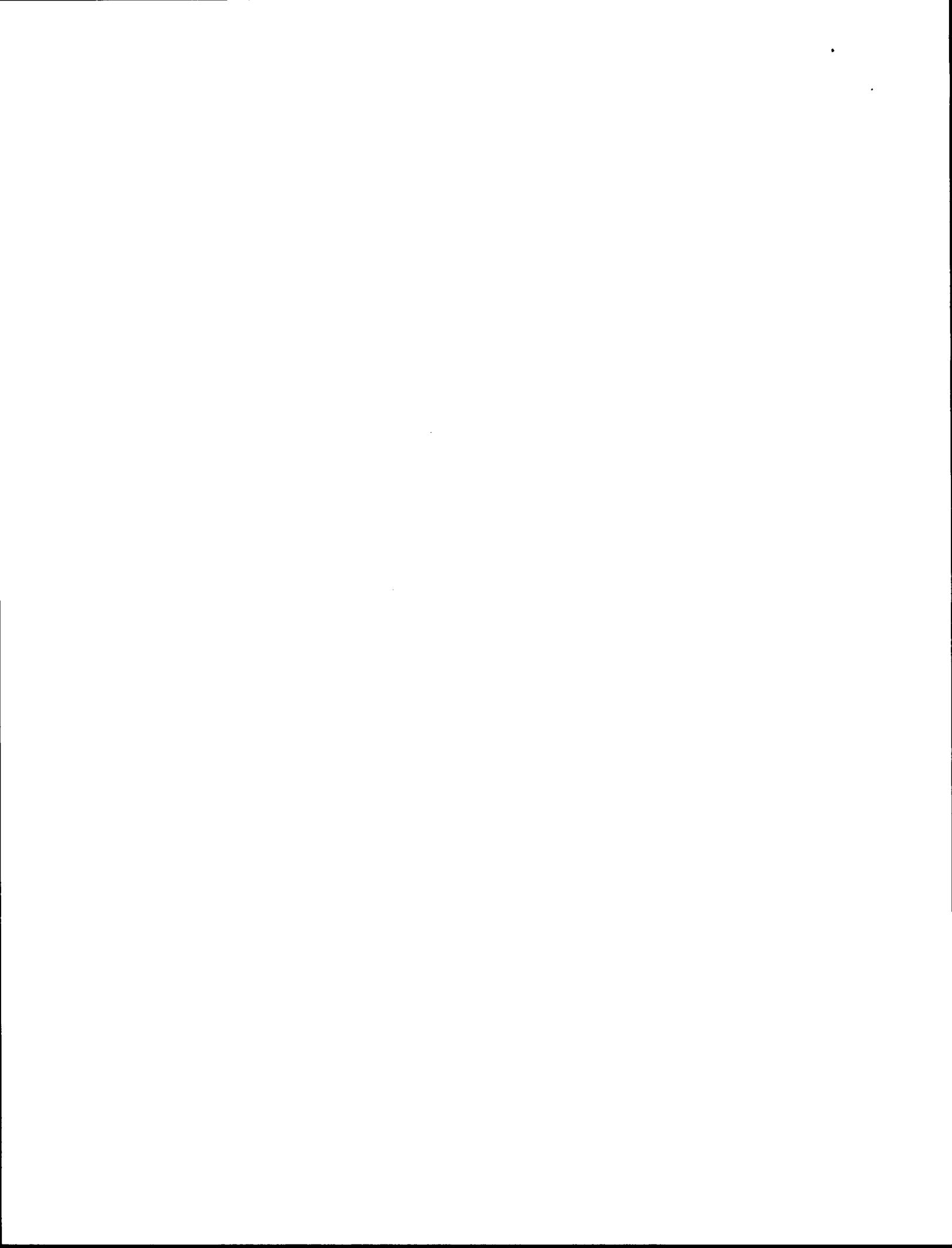
We look forward to working with the Board of Game and the Alaska Department of Fish and Game on these issues. Please contact Trevor Fox, Regional Subsistence Coordinator, at (907) 786-3400 with any questions you may have concerning our comments.

Sincerely,

Mitch Ellis
Chief of Refuges, Alaska Region

Acting

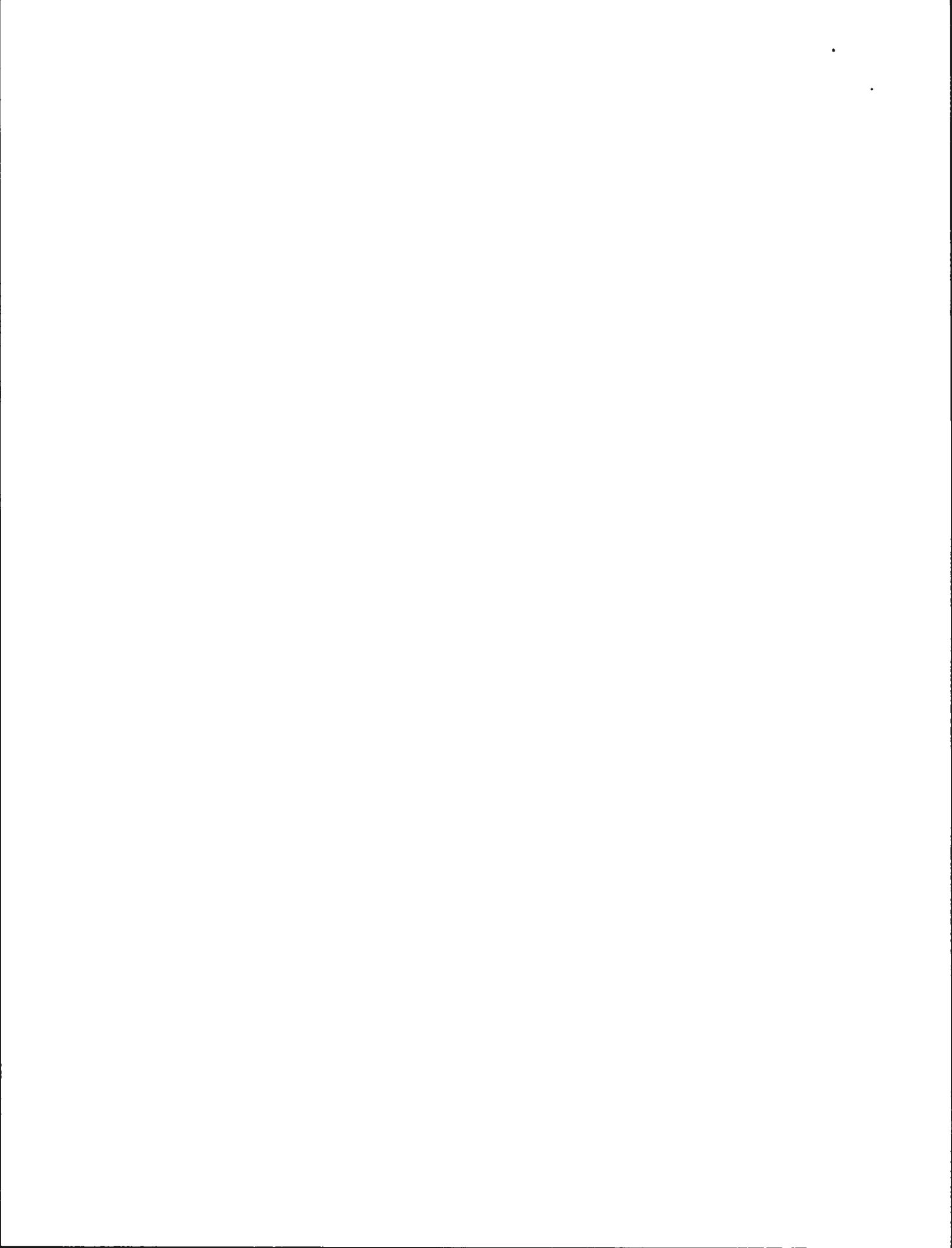
Enclosure



**RECOMMENDATIONS
ALASKA BOARD OF GAME PROPOSALS**

**Statewide
March 17 – 28, 2016
Fairbanks, Alaska**

National Wildlife Refuge System, Region 7, U.S. Fish and Wildlife Service



Proposal 62 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Remove the requirement to remove all contaminated soil from bear bait stations.

Response: National Wildlife Refuges is **opposed** to this proposal on National Wildlife Refuge lands. Failure to remove all attractants is a public safety issue, as the stations will continue to attract bears during closed seasons when bait stations are not marked. Bears could become habituated to baited areas and continue to frequent those areas during closed seasons.

Proposal 64 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Change statewide regulation to allow for the harvest of brown/grizzly bear at registered black bear stations, subject to established brown/grizzly bear seasons. No baiting of brown/grizzly bear in units that do not have black bear.

Response: National Wildlife Refuges is **opposed** to this proposal on **National Wildlife Refuge lands**. If the Alaska Board of Game supports the proposal, we recommend **adopting with modification** to exclude National Wildlife Refuge lands.

The proposal would affect 15 of 16 National Wildlife Refuges and has the potential to greatly increase the effectiveness of taking predators and disrupt natural processes and wildlife interactions. Regulations or activities on refuges in Alaska that allow for unsustainable (i.e., particularly efficient) methods and means for the take of wildlife that could lead to overharvest or the disruption of natural or biological diversity, biological integrity, or environmental health are in direct conflict with our legal mandates for administering refuges in Alaska under ANILCA, the National Wildlife Refuge Improvement Act, and the Wilderness Act, as well as several applicable agency policies (601 FW 3, 610 FW 2, and 605 FW 2).

Proposal 94 – 5 AAC 92.033. Permit for scientific, education, propagative, or public safety purposes; and 92.047. Permit for using radio telemetry equipment. Require the implementation of state wildlife plans before issuing permits for education or telemetry.

Response: National Wildlife Refuges is **neutral** on the proposal. The U.S. Fish and Wildlife Service (Service) is not legally obligated to obtain a state-issued permit in order to conduct scientific research. In the past, the Service has chosen to obtain these types of permits only as a matter of cooperation and to further coordination with State agencies. We believe this to be an effective way to maintain close working relationships as well as furthering intergovernmental awareness of mutually important research goals and conservation issues.

