



## United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
1011 E. Tudor Rd.  
Anchorage, Alaska 99503



February 17, 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 February 17-25, 2017 meeting addressing Interior and Northeast Arctic Region issues. We reviewed the proposals pertaining to the Region and offer the following comments regarding Proposals 72, 79, 92, 99, 111, and 112.

### **Proposals 72 and 112 – Allow same-day harvest of wolves and coyote**

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

Proposal 72 would allow the same day harvest of wolves and coyotes, with a trapping license, throughout the Interior and Northeast Arctic Region.

Proposal 112 would allow the same-day harvest of wolves in Unit 25D, which includes large portions of the Yukon Flats National Wildlife Refuge and portions of Arctic National Wildlife Refuge.

The proposal conflicts with Refuge regulations that prohibit the taking of wolves on the same day that a person has been airborne. Regulations include an exception for trappers that are dispatching wolves or wolverine that are legally caught in a trap or snare. Specifically, the Refuge-specific regulations for Alaska at 50 CFR 36.32(d)(1)(iv) state that *it is unlawful for a person having been airborne to use a firearm or any other weapon to take or assist in taking any species of bear, wolf, or wolverine until after 3 a.m. on the day following the day in which the flying occurred, except a trapper may use a firearm or any other weapon to dispatch a legally caught wolf or wolverine in a trap or snare on the same day in which the flying occurred. This prohibition does not apply to flights on regulatory scheduled commercial airlines between regularly maintained public airports.* While the proposal requires a trapping license, it would allow for the harvest of free-ranging wolves and coyotes that are not caught in a trap.

**Proposals 79, 92, 139, and 140 – Permit the harvest of brown bear over bait.**

*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 19A, 20F, and 21C, which includes the portions of the Yukon Delta, Yukon Flats, and Koyukuk 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 99 – 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.

**Proposal 111 – Open a snaring season for black bear in Unit 25D.**

*Recommendation:* The NWRS Program is **opposed to the extended season on Refuge lands.**

The proposal would allow the practice of using snares to take black bears in Unit 25, which includes large portions of the Yukon Flats National Wildlife Refuge and portions of Arctic National Wildlife Refuge. 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 use of snares, nets, or traps to take any species of bear.

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,



Mitch Ellis,  
Chief of Refuges, Alaska Region