



IN REPLY REFER TO:

15014ajl

Mr. Ted Spraker, Chair
Alaska Board of Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99881-5526

United States Department of the Interior

KENAI NATIONAL WILDLIFE REFUGE

P.O. Box 2139
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RC 020



February 25, 2015

Dear Chairman Spraker:

The U.S. Fish and Wildlife Service (Service), Kenai National Wildlife Refuge (Refuge) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game at its March 13-17, 2015 Region II – Southcentral meeting in Anchorage.

Proposals for Moose: Support ADFG Recommendations

Specific to proposals addressing harvest of bull moose in Game Management Units 7 and 15, the Refuge supports the recommendations of the Alaska Department of Fish and Game for continuation of current antler restrictions for the upcoming cycle. The current regulations appear to have been successful in improving bull:cow ratios, and the recent allowance of spike bull harvest has provided additional harvest opportunity. Fall composition data is most complete for GMU 15C, where bull:cow ratios have improved from a low of 9 bulls:100 cows in 2010 to 26 bulls:100 cows in 2014. Concurrently, annual general season harvests in GMU 15C have increased from a low of 25 in 2011 to 126 in 2014 (preliminary data). Given the Department's management goal of 20 bulls per 100 cows and the 2013 population estimate of 3,204 ± 650 moose for GMU 15C, additional hunting opportunity for bulls could be provided.

Proposal 170 – Brown Bear

The Refuge submitted Proposal 170 last spring as a place holder. Our recommendations at that time were based upon analyses of impacts from increased levels of human-caused mortalities (HCM) of Kenai brown bears in 2012 and 2013. We have recently received updated HCM data from the Alaska Department of Fish and Game, including final totals for 2014 and improved age data from tooth analyses for a sample of bears killed in 2012 and 2013. We are currently in the process of analyzing these data.

In general, we expect that recommendations outlined in Proposal 170 will remain similar; i.e., application of a front country/back country approach with differential HCM caps and season dates. Based on population modeling using the updated HCM data, we do expect to revise the suggested harvest caps on adult female bears, and to add a recommendation for a total HCM cap, for managing future hunting seasons.

The goal of our proposal and updated recommendations remain the same, i.e., to ensure the long-term conservation of a healthy brown bear population on the Kenai Peninsula in a manner which provides for public interests, protects public safety and which best meets the missions and legal mandates of resource agencies, including those of the Refuge. As stated in the proposal, we are committed to working on a strategic and coordinated approach with the Alaska Department of Fish and Game, the Board and all stakeholders toward meeting this goal. We would welcome the opportunity to present our findings and updated recommendations to the Board.

Proposal 177- Beaver: Oppose

This proposal would shift the opening of the trapping season for beaver to an earlier date to allow for open water trapping in Game Management Units 7 and 15. The Refuge is opposed to this proposal, specific to Refuge lands within these units, as we were to a similar proposal considered but not adopted by the Board in March 2011.


The status of beaver populations has been indexed on the Refuge since the 1980's through aerial surveys which count active beaver lodges. Historically, beaver densities in the GMU 15A portion of the Refuge have been low compared to reported densities elsewhere. No new high quality beaver habitat has been created on the northern portion of the Refuge since a large wildfire in 1969. Our most recent surveys, conducted in 2007 and 2009, indicate that beaver densities remain relatively low, with numbers of active lodges observed remaining similar to those documented in the 1990s.

We are also concerned that allowing open water trapping of beaver could result in take of non-target species including otter, muskrat and mink, species for whom trapping seasons would be closed until November 10.

Beaver trapping opportunity has been successfully provided and maintained on the Refuge by trapping through the ice, under stipulations of the Refuge trapping permit and voluntary actions of trappers to limit harvest in designated areas. We believe continuation of this approach is in the best interest of this important wildlife resource and users of the Refuge.

Thank you for your time to review our comments, and for the service of all Board members. We very much appreciate the opportunity to coordinate and cooperate with the Board and the Department as we move forward with our shared management responsibilities on the Kenai Peninsula. If you have questions, please contact me at (907) 262-7021.

Sincerely,



Andy Loranger
Refuge Manager
Kenai National Wildlife Refuge