



**United States Department of the Interior  
KENAI NATIONAL WILDLIFE REFUGE**

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In reply refer to: 19\_010ajl

March 14, 2019

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

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 14-19, 2019 Region II – Southcentral meeting.

Proposals 63 – 78 deal with moose harvest within Unit 15 or Units 7 & 15. The refuge supports additional harvest opportunities within Unit 15C and believe that current population estimates support an increase in harvest within this unit. We further believe that habitat response to the Funny River Fire, which occurred within Unit 15B in 2014, will soon provide additional hunt opportunities within Unit 15B. The refuge does not believe that moose numbers within the Refuge portions of Units 7 & 15A would support any additional harvest at this time.

Two proposals, Proposals 88 and 90, affect management of the Skilak Wildlife Recreation Areas (WRA) on the Refuge. These proposals would modify existing State regulations applying to a youth small game hunt and adjust area boundaries. We respectfully request that the Board not adopt these proposals for the following reasons.

Since the mid-1980's, the Refuge's primary public use management objectives in the Skilak WRA have been to provide the public with opportunities for wildlife viewing and photography, environmental education and interpretation. The Refuge's public use management objectives for the Skilak WRA were developed through full public involvement and in coordination with the Alaska Department of Fish and Game during development of the Refuge's first comprehensive conservation plan (CCP) in 1985, and recently reaffirmed through our Skilak WRA Management Plan in 2008 and our revised CCP in 2010.

Managing the area with an emphasis on providing these types of recreational and educational activities supports meeting legally-mandated Refuge establishment purposes under the Alaska National Interest Lands Conservation Act for providing opportunities for interpretation and

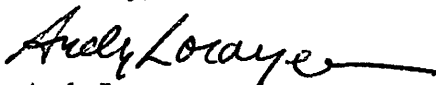
environmental education and "wildlife-oriented" recreation. Wildlife viewing and photography and environmental education and interpretation, along with hunting and fishing, are recognized as the six priority public uses of the National Wildlife Refuge System under the Refuge Improvement Act of 1997. To support its management objectives, the Service has developed extensive visitor facilities in the area, including over 25 miles of hiking trails, 8 campgrounds, 3 public use cabins, and several interpretive kiosks and panels. Refuge rangers regularly provide interpretive programs for visitors to the area including guided hikes, campfire programs, summer and fall camps for children and environmental education programs for visiting school groups. Public use in the Skilak WRA for wildlife viewing and photography, camping, hiking, boating, fishing, and participation in interpretive and environmental education programs is highest from June through October. Winter use for cross country skiing, ice fishing, snow shoeing and hiking is expanding, as is winter use of the area's public use cabins.

The firearms youth small game hunt was an outcome our 2008 management planning effort, for which one objective was to consider providing additional non-conflicting hunting opportunities. The youth hunt is currently authorized for weekends in November and December in a designated portion of the Skilak WRA. Proposal 90 seeks to remove the date restrictions for the small game youth hunt and expand the youth hunting area to the entirety of Skilak WRA. The timing and location of the youth small game hunt were specifically designed to minimize conflicts between users, to enhance public safety, and to support the Service's primary public use management objectives for the Skilak WRA. These remain important considerations for the Service in managing public uses in the area.

Proposal 88 modifies the Skilak Loop Wildlife Management Area boundary. While the proposed boundary change is a relatively minor one, we believe any action by the Board on this proposal will create confusion due to conflicting boundaries between the Refuge's Skilak WRA, Alaska State Park's Kenai River Special Management Area and the Alaska Department of Fish and Game's (ADFG) Skilak Loop Management Area. We believe this issue should be addressed through coordination between the ADFG, Alaska State Parks and Kenai NWR outside of the Board process.

The Service strongly supports providing quality hunting opportunities on national wildlife refuges. Many Service staff in Alaska, including several Kenai refuge staff, work closely with youth while serving as hunter education and archery instructors, and we would look forward to working with stakeholders on additional ways to engage and involve youth in the hunting tradition. Thank you again for this opportunity to provide input.

Sincerely,



Andy Loranger  
Refuge Manager