



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Togiak National Wildlife Refuge
 P.O. Box 270
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February 12, 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:

Please accept the following comments from the Togiak National Wildlife Refuge (Refuge) concerning the proposals to be considered by the Alaska Board of Game during its February 13-20, 2015 meeting. These comments are in addition to those we submitted in a letter dated January 26, 2015.

Proposal #53 – Oppose baiting/Neutral on bag limit change

Rationale: We are opposed to allowing moose carcasses from natural mortalities to be moved into locations that are more conducive to hunting bears. This provision may encourage the poaching of moose to be used in this manner; this likely is why this practice is currently not allowed anywhere in the state.

We are also opposed to allowing the use of bait and lures for taking brown bears as this has the potential to condition brown bears to eat and seek out human food which would result in more conflicts (i.e. defense of life or property damage) with other users. Secondly, the brown bear harvest on the Refuge has increased over the past few decades, and we are concerned that measures to further increase the harvest will ultimately prove unsustainable. Further, the practice of using bait for brown bears is in conflict with the proposed regulatory changes currently being considered for all National Wildlife Refuges in Alaska. These draft regulatory changes are being proposed to ensure that the taking of fish and wildlife on Refuges in Alaska is consistent with federal laws and U.S. Fish and Wildlife Service policies.

Baiting is currently permitted on the Refuge for black bears. The Refuge currently supports small numbers of black bears and black bear hunting is only practiced by a few hunters.

We are neutral on returning to a one bear per year bag limit.

Thank you for your time to review our additional comments on this proposal. If you have any questions, please contact me or Supervisory Wildlife Biologist Pat Walsh at (907) 842-1063.

Sincerely,



Susanna Henry
Refuge Manager

Cc:

Heather Abbey Tonneson, National Wildlife Refuge System, Alaska Region

This is a final, ^{2/12}
amended version of
our comments on Prop 53
Thank you!
Susanne