



United States Department of the Interior

NATIONAL PARK SERVICE
Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
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FEB 01 2018

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker,

The National Park Service (NPS) appreciates the opportunity to comment on the 93 proposals for the Central/Southwest Region being considered by the Alaska Board of Game (BOG). Below are our recommendations on proposals that affect or have the potential to affect NPS areas. As you review our comments, please realize that the NPS mission and mandates differ from the State of Alaska and other federal agencies, and hunting activities in NPS areas may therefore require different management approaches that are consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). We recognize and support the State's primary stewardship role in wildlife management, while at the same time; we must ensure that laws and regulations of the NPS are upheld.

Proposal 84: NPS Recommendation: Oppose

This proposal would raise the population objective for moose in Unit 16B. NPS believes that ADF&G biologists should initiate changes in population objectives.

Proposal 107: Oppose

This proposal would open a late resident hunting season for moose in Units 11 and 13 by adding a late-season any-bull registration hunt. The NPS does not support this proposal due to conservation concerns. Although the number of permits that would be issued for Unit 11 is limited, a winter hunt would increase moose harvest and could negatively affect the moose population. In addition, the Nabesna Road ((RM291 hunt area) is easily accessible to hunters and already receives high hunting pressures in the fall.

Proposal 111: NPS Recommendation: Oppose

This proposal would open a fall season for hunting over bait (except for portion of Unit 13E in Denali State Park) for brown and black bear in Unit 13. Hunting bears over bait is currently prohibited on NPS lands. Should the Board adopt this proposal, the NPS requests that park exemptions be reflected in State hunting regulations.

Proposal 112: NPS Recommendation: Oppose

This proposal would lengthen the hunting season in Unit 11 for brown bears. The NPS has concerns with this proposal, which would further liberalize brown bear harvest. Although more biological data is needed to fully evaluate the potential impacts of this proposal, brown bear harvest in Unit 11 has been declining and the proportion of females taken in the harvest increasing, indicating overall population decline.

Proposals 113, 114, 115: NPS Recommendation: Oppose

Proposal 113 and 114 extend the trapping season for wolverine in Unit 13 from January 31 to February 28 and Proposal 115 would extend the trapping season for wolverine in both Unit 11 and 13 from January 31 to February 28. NPS shares similar concerns with ADF&G in lengthening the trapping season to February 28 because it will likely increase the harvest. Further, consideration should be given to the vulnerability of wolverines during denning. Given that females give birth as early as February, there would be potential for harvest of lactating females, resulting in lower kit survival. There is also a lack of biological data on wolverines in Unit 11 and 13 on which to base a liberalized harvest.

Proposals 116: NPS Recommendation: Oppose

This proposal would allow for the incidental take of two furbearers in Unit 11 and 13. The current seasons and limits set by ADF&G for trapping furbearers are based on biological criteria to protect populations and prevent overharvesting. Incidental take could be additive to allowable harvest, could result in mortality of dependent young for some species, and should be discouraged.

Proposal 117: NPS Recommendation: Support

This proposal would reduce the harvest and possession limits for grouse in Unit 11. For several years, there has been a growing concern regarding the liberal bag limits for grouse and the increasing interest by hunters harvesting large numbers of grouse within Wrangell-St Elias National Preserve (WRST). Local residents have expressed concern about these harvest levels and their impact on grouse populations during recent harvest surveys and in other venues. In addition, park staff have reported frequent encounters with large groups of hunters along the Nabesna Road (Unit 11 & 12) and McCarthy Road (Unit 11) who harvest their limits, resulting in significant cumulative take of grouse. NPS staff and the WRST Subsistence Resource Commission are concerned that if adverse weather conditions or other factors reduce recruitment, these high harvest levels could be unsustainable. Adoption of this proposal is a step in the right direction and will help prevent overharvesting.

Proposals 131 and 132: NPS Recommendation: Oppose

Proposal 131 would change the brown bear bag limit in Unit 9, from one bear every four years for residents to one bear every two years; and proposal 132 would open a resident-only early season for the current registration brown bear hunts in Unit 9, or open resident-only registration or drawing permit hunts. NPS shares the conservation concerns of the Aniakchak Subsistence Resource Commission and is opposing this proposal. Limited data indicate that the brown bear activity at Aniakchak has been low in recent years and increasing harvest could have negative impacts on the small population there.

Proposal 135: NPS Recommendation: Support

This proposal would close the season for Alaska hares in Unit 9. ADF&G recently reported that the hare population is now at very low density and has patchy distribution in the southern portion of the AK peninsula. We support ADF&G in a precautionary closure to protect these localized populations.

Proposals 145, 146 and 147: NPS Recommendation: Oppose

These three proposals concern the Mulchatna caribou herd. Proposal 145 would open a non-resident registration hunt in Units 9 & 17, Proposal 146 would open a guide-required non-resident drawing hunt and proposal 147 would open a non-resident draw hunt. NPS shares the Department's concerns for the herd's declining population trend and supports efforts to collect more reliable harvest data to inform management decisions. The most recent population estimate in 2016 is 27,000, which is below population management objectives and Amount Necessary for Subsistence (ANS). In addition, the herd is also experiencing a low bull: cow ratio and low recruitment. All of this points to an overall negative population trend and a need for more conservative management.

Proposal 148: NPS Recommendation: Oppose.

This proposal would allow the pursuit of caribou, wolf, and wolverine by snowmachine in Unit 17. As the NPS has commented before, federal regulations prohibit the taking and disturbing of wildlife by snowmachines on NPS lands. The use of snowmachines gives hunters an increased advantage in winter months and may result in incidental impacts to caribou, wolf, wolverine and other wildlife populations. If the Board adopts this proposal, the NPS requests that the Board exempt NPS lands and that the exemption is indicated in the State hunting regulations.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me or Mary Hake, wildlife biologist and liaison to the Board of Game, (907) 644-3576.

Sincerely,



Debora Cooper
Associate Regional Director
National Park Service

cc:

Sam Cotten, Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Bruce Dale, Chief, Division of Wildlife, ADF&G
Steve Wackowski, Special Assistant to the Secretary for Alaska
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