

United States Department of the Interior



FISH AND WILDLIFE SERVICE
Kodiak National Wildlife Refuge
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February 1, 2013

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

To Whom It May Concern:

Kodiak National Wildlife Refuge submits the following comments on regulation proposals pertaining to the Kodiak area (Unit 8) for consideration of the Board of Game.

Proposal 140

The Refuge opposes proposal 140. The proposal would not substantially influence recovery of the Sitka black-tailed deer population and unnecessarily reduce hunter harvest opportunity. While this proposal could facilitate modest herd recovery in areas that receive relatively high hunting pressure, the effect would be negligible over most of the unit area. In the area surrounding the city of Kodiak, current harvest regulations, which limit harvest to bucks during rifle season, provide sufficient protection to promote herd recovery. With few exceptions, winter weather is the primary factor regulating deer populations of the Kodiak Archipelago.

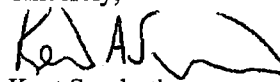
Proposal 141

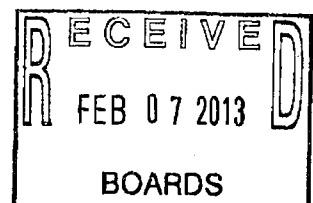
The Refuge supports proposal 141. As written, the proposal could increase hunting opportunity for introduced mountain goats on Kodiak Refuge lands where additional harvest would be beneficial. Increased harvest would prevent the population from exceeding habitat capacity and damaging alpine habitat. Without increased harvest, the population would likely exceed habitat capacity and decline substantially. Such a decline would curtail hunting opportunity. In cooperation with ADF&G, the Refuge has monitored the population and documented its exponential increase. Additional harvest is needed to check and maintain the population within ADF&G prescribed population management goals.

Proposal 142

The Refuge supports proposal 142. The proposal would promote ethical hunting practices of mountain goats in Game Management Unit 8. While the Refuge promotes increased harvest of mountain goats on Refuge lands, it is important this take occurs without significant wounding and loss of animals that are not recovered. Sport hunting is an important priority public use of Kodiak Refuge, and we support reasonable regulations that promote ethical hunting practices.

Sincerely,


Kent Sundseth
Acting Refuge Manager



cc: Larry Van Daele
Oliver Holm
Tracey McDonnell