



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1011 E. Tudor Rd.

Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

NWRS705-011.gb

OCT 18 2004

Mr. Mike Fleagle, Chairman  
Alaska Board of Game  
Board Support Section  
P.O. Box 25526  
Juneau, Alaska 99802-5526

Dear Chairman Fleagle:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to comment on proposals being considered by the Alaska Board of Game. For this meeting, the Service will address Proposal 69, "Wolf and Brown Bear Predation Control Implementation Plans" in Game Management Unit 12. Tetlin National Wildlife Refuge occupies 15 percent of Unit 12 and the Service respectfully requests that, should the Board adopt Proposal 69, Tetlin Refuge lands be explicitly excluded from the plan.

The Service considers predator management on Refuge lands in Alaska a legitimate wildlife management tool. However, Service policies and regulations require a thorough analysis prior to considering a predator control program. Foremost, such a management action must have sound biological justification and be used in a prudent and ecologically sound manner to conform to the Service's *Policy on Maintaining the Biological Integrity, Diversity, and Environmental Health of the National Wildlife Refuge System*<sup>1</sup>. Because predator control on Tetlin Refuge would be considered a major Federal action, it must also meet National Environmental Policy Act requirements.

An October 30, 1992, letter from the Service's Regional Director to the Commissioner of the Alaska Department of Fish and Game identified other factors to be considered before predator control could be authorized on national wildlife refuges in Alaska including:

- The needs and benefits of predator control must be based on sound biological justification.
- A thorough evaluation must be given to substantiate intended benefits of the control efforts.
- Alternatives to control must be evaluated, attempted, and exhausted as a practical means of achieving management objectives.

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<sup>1</sup> USFWS. "Service Manual." *Policy on Maintaining the Biological Integrity, Diversity, and Environmental Health of the National Wildlife Refuge System* (601 FW3). <http://policy.fws.gov/manual.html>

- The Service must evaluate the effects of proposed control on subsistence uses and needs as required by Section 810 of the Alaska National Interest Lands Conservation Act.

Also, pursuant to Service regulations, refuge uses are subject to a compatibility determination. To allow predator control based on the above analysis, the Refuge Manager must find the proposal compatible with the purposes of the refuge, the National Wildlife Refuge System Administration Act, Service policies, or resource management objectives identified in the refuge's comprehensive conservation plan.

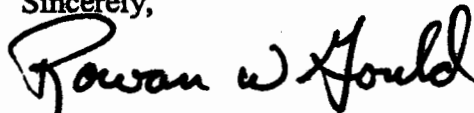
The Service previously addressed Proposal 69 in a letter to the Board from Tetlin Refuge Manager, Edward Merritt (September 10, 2004). In this letter, Mr. Merritt stated that moose densities are a table on Tetlin Refuge, and that fall sex-age composition surveys from 1987-2004, does not show a downward trend or indicate the moose population is adversely affected by high rates of predation.

Additionally, the Service urges the Board to consider rescinding changes in the language of 5 AAC 92.110(j) and 5 AAC 92.115(h) adopted by the Board at its March 2004 meeting. At that meeting, the Board replaced the requirement for *consent* of the applicable land manager before conducting wolf and bear population reduction or regulation activities on Federal lands with a requirement for *coordination* with the appropriate Federal agencies. Without explicit prior authorization by the Service, predator control activities conducted on National Wildlife Refuge lands in Alaska involving the use of aircraft to take wolves or the use of any mechanized vehicle to chase, harass or unduly disturb wildlife would violate Service regulations and would subject participants in such activities to enforcement actions. The potential for unintended consequences of miscommunication or inadequate consultation/coordination can be avoided by requiring the prior concurrence of the Service.

If the Board procedures prevent action to consider changes to 5 AAC 92.110 and .115 at the November meeting, we ask that you consider these changes at the earliest opportunity through an agenda change request.

We appreciate the opportunity to provide comments on this proposal. If you have any questions regarding our review, please contact Danielle Jerry, Chief, Natural Resources, at (907) 786-3335.

Sincerely,



Regional Director