

Kenai National Wildlife Refuge  
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### **COMPATIBILITY DETERMINATION**

*The National Wildlife Refuge System Administration Act of 1966, as amended (16 U.S.C. 668dd-668ee) states that “The Secretary is authorized, under regulations as [s]he may prescribe, to – (A) permit the use of any area within the [National Wildlife Refuge] System for any purpose, including but not limited to hunting, fishing, public recreation and accommodations, and access wherever [s]he determines that such uses are compatible’ and that “... the Secretary shall not initiate or permit a new use of a refuge or expand, renew, or extend an existing use of a refuge, unless the Secretary has determined that the use is a compatible use and that the use is not inconsistent with public safety.” A compatible use is defined as “A proposed or existing wildlife-dependent recreational use or any other use of a national wildlife refuge that, based on sound professional judgment, will not materially interfere with or detract from the fulfillment of the National Wildlife Refuge System mission or the purposes of the national wildlife refuge.” The compatibility determination is to be a written determination signed and dated by the Refuge Manager and Regional Chief of the National Wildlife Refuge System, signifying that a proposed or existing use of a national wildlife refuge is a compatible use or is not a compatible use.*

*Applicable compatibility regulations in 50 CFR Parts 25, 26, and 29 were published in the Federal Register October 18, 2000 (Vol. 65, No. 202, pp 62458 – 62483).*

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**Use:** Trapping

**Refuge:** Kenai National Wildlife Refuge

**Establishing and Acquisition Authorities:** The Refuge was first established as the Kenai National Moose Range by Executive Order 8979 on December 16, 1941. The boundaries were modified, purposes expanded, and name changed to Kenai National Wildlife Refuge under the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) on December 2, 1980 (Public Law 96-487 Stat. 2371).

**Refuge Purposes:** The Executive Order purpose was primarily to “... protect the natural breeding and feeding range of the giant Kenai moose on the Kenai Peninsula, Alaska...”. ANILCA purposes for the Refuge include: “(i) to conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to moose, bear, mountain goats, Dall sheep, wolves and other furbearers, salmonids and other fish, waterfowl and other migratory and nonmigratory birds; (ii) to fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats; (iii) to ensure to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph (i), water quality and necessary water quantity with the refuge; (iv) to provide in a manner consistent with subparagraphs (i) and (ii), opportunities for scientific research, interpretation, environmental education, and land management training; and (v) to provide, in a manner compatible with these purposes, opportunities for fish and wildlife oriented recreation.” The Wilderness Act of 1964 (Public Law 88-577) purposes are to secure an enduring resource of wilderness, to protect and preserve the wilderness character of areas within the National Wilderness Preservation System,

and to administer this wilderness system for the use and enjoyment of the American people in a way that will leave them unimpaired for future use and enjoyment as wilderness.

Policy (FWS 603 2.8) directs that pre-ANILCA purposes remain in force and effect, except to the extent that they may be inconsistent with ANILCA or the Alaska Native Claims Settlement Act, and that such purposes only apply to those areas of the Refuge in existence prior to ANILCA. The Executive Order purpose to protect Kenai moose, however, is treated as complimentary to the broader ANILCA purpose of conserving fish and wildlife populations; therefore, no special attention is given the Executive Order purpose in this compatibility review process.

Sec. 4(a) of the Wilderness Act provides that the purposes of the Act are to be within and supplemental to the purposes for which national wildlife refuges are established and administered. These purposes are applied to the approximately 1.3 million acres of Congressionally designated wilderness within the Refuge. While these purposes do not apply to the remaining approximately 700,000 acres of Refuge lands that are not designated as wilderness, we must consider the effects of uses on any Refuge lands that might affect the wilderness areas.

**National Wildlife Refuge System Mission:** The National Wildlife Refuge System Mission is “To administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.

**Description of Use:** Trapping is a historical activity on the Kenai NWR, and throughout Alaska, that has attributes that include recreation, commercial, and subsistence elements. Trapping is mentioned as a traditional activity in ANILCA and though not considered a “wildlife-dependent recreational activity” as defined by the National Wildlife Refuge System Administration Act of 1966, as amended, has deep rooted historical connections to uses of the Refuge and area wildlife. Informal policy does not treat trapping as a commercial use unless one or more persons is hired to engage in portions of the activity, and wages are paid as part of the activity. This does not currently occur on the Refuge.

Trapping of furbearers takes place during authorized seasons from late Fall to early Spring, corresponding to cold weather and better fur or pelt conditions. These seasons are protective of furbearer breeding and rearing of young. Trapping is permitted under the conditions of both State of Alaska general trapping regulations and Federal regulations requiring a permit from the Refuge (with Refuge-specific stipulations included as part of the permit conditions). Trapping techniques vary for different species of animals, but largely employ either a leg-hold steel trap, steel snare wire, or conibear or “kill” trap. Traps are set with an attractant to encourage an animal to approach the set, or along an expected travel route. Some sets are made to hold an animal (such as many leg-hold sets) until the trapper returns to check the set, while others are designed to kill the animal quickly after catching it (such as most conibear sets and many “drown” sets made for species such as beaver and river otter). Smaller animals such as mink and ermine, may succumb to the cold even though caught in a leg-hold type trap during cold winter months, before a trapper may return to check the set. Larger animals caught in leg-hold traps, such as lynx, wolf, and coyote, generally have to be killed by the trapper. Killing techniques vary but generally larger animals are dispatched with a .22 caliber rifle or pistol shot.

Furbearing animals found on Kenai NWR include wolf, coyote, lynx, wolverine, ermine/weasel, river otter, mink, beaver, muskrat, red fox, and marten. Red squirrels, ground squirrels, and marmots are also found on the Refuge and are considered to be furbearers under State regulations.

Trapping season generally opens on November 10, but varies somewhat for some species over time. Trapping season closing dates are more variable, depending on species, but are generally between the end of January and the middle of May. General 2005-2006 State trapping season and bag limit information for GMU 15 (to include areas within the Refuge) follow:

Species	Open Season	Limit	Special Rules
beaver	Nov. 10 – Mar. 31	20	must seal w/in 30 days
coyote	Nov. 10 – Mar. 31	none	may shoot same day airborne
red fox	Nov. 10 – Feb. 28	1	may only use trap or snare may shoot same day airborne
lynx	Jan. 1 – Jan. 31	none	must seal w/in 30 days may shoot same day airborne
marten	Nov. 10 – Jan. 31	none	must seal w/in 30 days
mink	Nov. 10 – Jan. 31	none	
weasel	Nov. 10 – Jan. 31	none	
muskrat	Nov. 10 – May 15	none	
river otter	Nov. 10 – Feb. 28	none	must seal w/in 30 days seasonal trap size/type restriction
squirrel & marmot	no closed season	none	
wolf	Nov. 10 – Mar. 31	none	must seal w/in 30 days no shooting same day airborne unless wolf is caught in trap or snare
wolverine	Nov. 10 – Feb. 28	none	must seal w/in 30 days no shooting same day airborne unless wolverine is caught in trap or snare

Wolves and wolverines are classified as both big game and as furbearers. The Alaska Hunting Regulations apply if they are taken under a hunting license; the Alaska Trapping Regulations apply if they are taken under a trapping license. With some exceptions, firearms may be used as an authorized means of take of furbearers under a trapping license (rather than using a trap). State regulations also specify a variety of methods and means restrictions, such as the type of bait allowed, salvage requirements of harvested furbearers, and other regulations. For a complete set of State trapping regulations see the annual printed regulations summary, and applicable State of Alaska statutes.

Federal regulations (50 CFR 36.32(c)(1)(iii)) require all persons trapping on Kenai NWR to secure a trapping permit. Permit conditions are consistent with the goals and objectives described in the 1988 Kenai NWR Furbearer Management Plan and Environmental Assessment. Current Refuge trapping permit requirements include:

- all traps and snares will be identified by their owner by a Refuge-approved mark or tag
- all traps and snares will be checked at least every four days in GMU 15A and GMU 15B(West) portions of the Refuge and once at least every seven days throughout the remainder of the Refuge. Conibear and drowning sets must be checked at least once every seven days throughout the Refuge. As of January 1992, trappers who have attended a seminar on the use of snares, co-sponsored by the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game, and who use only snares (which have been modified to allow “break away” for larger non-target on their trap lines), are required to check snares once every seven days in the portion of the Refuge in GMU 15A and GMU 15B (West)
- traps and snares are prohibited within 30-feet of sight-exposed baits -sight-exposed bait means any visible part or facsimile thereof, (including dry skeletal items from which the skin, hair, feathers, and flesh have been removed) used to visually attract an animal to a trap or traps
- report all tags and radio collars taken from furbearers within three days and return within five days to the Refuge
- trapping is prohibited within one mile of public roads, campgrounds, road accessible trailheads, and within Skilak Wildlife Recreation Area (SWRA) – including the Kenai River within this area – and Headquarters area as depicted on map available at Refuge Headquarters, provided, however, that trapping for mink and muskrat using leg hold traps 1 ½ or smaller and 110 or 120 conibears will be allowed in these areas outside of the SWRA and Headquarters area
- steel leg hold traps having teeth, spiked, or serrated jaws (either attached or as part of the trap) are prohibited
- cubby and flag sets are not allowed when the lynx season is closed
- an accurately completed furbearer harvest report must be submitted to the Refuge Manager by June 15
- only one set per beaver lodge is authorized throughout that portion of the Refuge in GMU 15A – a set is one leg hold or conibear trap or a pole with a configuration of snares
- each beaver lodge that is being trapped or has been trapped the current season shall be visually marked with a pole vertically set in the ice
- only one beaver per lodge is permitted to be taken from the Swan Lake Canoe System Area of the Refuge
- trappers are requested to voluntarily remove only one beaver per lodge from the Swanson River Canoe System Area and the remainder of the Refuge within GMU 15A
- Unit 15B east of the Kenai River, Skilak Lake, Skilak River, and Skilak Glacier is closed to the trapping of marten

Additionally, all trappers must attend a mandatory training class (offered by the Refuge once each Fall) at least once before receiving a Refuge trapping permit. The intent of the class, and Refuge trapping permit conditions, is to decrease the number of non-target wildlife caught; provide information important to managers; address public concerns over ethics, safety, and animal

suffering; improve trapper understanding of Refuge management objectives, and provide for a sustainable and compatible Refuge use.

Trapping on Kenai NWR varies from low levels of effort, such as the take of a couple of muskrats over a weekend along the Swanson River in Spring, to the establishment of long trap lines and considerable effort exerted for multiple species in multiple areas throughout the season. Most trappers travel to the start of their trap lines by use of highway vehicles along established routes; many employ snowmachines to reach remote areas. With deeper snow conditions snowshoes or skis are often used.

From 1984 to 2005 the Refuge issued 1479 trapping permits (average 74 per year) and received a total reported harvest of 4,174 animals, including 232 wolves (ave. = 12/year), 632 coyotes (ave. = 32/year), 350 lynx (ave. = 18/year), 58 wolverine (ave. = 3/year), 204 weasel/ermine (ave. = 10/year), 206 river otter (ave. = 10/year), 1318 mink (ave. = 66/year), 667 beaver (ave. = 33/year) and 507 muskrats (ave. = 25/year). The information is broken down per year as follows:

Season	Permits	Wolf	Coyote	Lynx	Wolverine	Weasel	Otter	Mink	Beaver	Muskrat
1984-85	107	38	107	31	2	17	20	392	103	121
1985-86	114	33	110	23	4	3	24	322	86	209
1986-87	109	17	43	33	5	2	21	88	55	85
1987-88	83	12	41	2	7	2	11	44	50	14
1988-89	63	12	15	1	0	1	1	17	17	6
1989-90	90	7	28	1	8	15	7	45	5	0
1990-91	52	3	22	0	0	6	4	16	7	5
1991-92	55	0	35	0	3	3	6	63	13	10
1992-93	63	7	21	0	1	0	11	27	31	6
1993-94	70	13	22	0	1	24	5	70	16	1
1994-95	58	11	23	0	4	18	2	35	5	0
1995-96	45	5	15	0	8	25	20	40	10	0
1996-97	75	8	14	12	6	36	22	41	18	4
1997-98	67	2	18	50	2	4	11	21	16	2
1998-99	72	21	35	90	5	2	6	11	18	8
1999-00	103	7	20	56	0	0	9	21	24	15
2000-01	71	5	0	28	0	3	8	28	79	2
2001-02	73	8	23	23	1	14	1	13	60	2
2002-03	52	4	14	0	0	26	15	20	47	13
2003-04	57	19	26	0	1	3	2	4	7	4
Totals	1,479	232	632	350	58	204	206	1,318	667	507

4,174 total number of furbearers reported taken 1984 - 2004

Harvest success varies greatly from year to year for a variety of reasons. Some years reported harvest is zero due to season closure, such as for lynx (closed by Alaska Board of Game actions during low lynx/snowshoe hare cycle periods). Sometimes harvest is low due to low snow years (making it difficult or impossible to access many areas with snowmachine), or during very cold periods (potentially making both fur animals and many trappers less active). Higher harvest generally reflects milder winters with good snow cover, and also often reflects a more committed

group of trappers. It is not uncommon for a few good trappers to take the majority of some species, largely due to their expertise and effort.

While the desire to get out-of-doors, interact with nature, or otherwise stay busy during long cold winters will motivate most trappers in some fashion or another, fur prices can also. Interest in lynx trapping, for example was far greater when pelts often brought in excess of \$500 each a number of years ago. Fur prices vary greatly and fluctuate with market supply and demands, often influenced most by the fashion industry in Asia and elsewhere in the World. Fur prices also vary greatly depending on size and sex of an animal, hair length and color, and location of harvest (northern examples of a species such as coyote almost always are in better condition and are more valuable than those taken in southern states). An example of current fur prices can be seen by the following summary of the North American Fur Auction held in February 2005 in Toronto, Canada:

Species	Description	Average Price \$	Top Price \$
river otter		\$106.51	\$240.00
beaver	Western I	\$ 17.12	\$ 46.00
coyote	Western Heavy	\$ 43.14	\$180.00
red fox	Grade I	\$ 19.57	\$ 76.00
lynx		\$132.65	\$300.00
mink	(wild) Northern	\$ 15.37	\$ 27.00
squirrel		\$ .70	\$ 1.80
ermine		\$ 3.45	\$ 9.20
wolverine		\$154.57	\$320.00
wolf		\$ 95.40	\$330.00

The number of trappers per capita is declining, in the Kenai area as elsewhere in Alaska; however, the total number of trappers is stable to slightly increasing over time, and the interest in trapping remains strong.

**Availability of Resources:** Administering the trapping program at Kenai NWR is an intensive effort requiring annual training programs, issuance of permits, permit compliance checks, answering questions to the trapping and non-trapping public, coordination of program with State biologists and Board of Game processes, furbearer management activities, and data compilation. An estimated over 300 hours of staff time is required each year in this effort. The current program has adequate staffing and resources available and there are no known program changes proposed within the near future. Any significant changes to the furbearer management plan would likely be time-consuming to complete with considerable cost to Refuge resources;

however, no significant changes are currently proposed. A significantly modified step-down plan would also require a new compatibility review.

**Anticipated Impacts of the Use:** Trapping has become a controversial activity with some publics due primarily to concerns about animal welfare. Public perceptions have run strong, both to preserve a traditional use of renewable wildlife resources, and the restriction or curtailment of the use by concerned organizations and individuals. This social environment has led to increased scrutiny of trapping programs across the United States, including within the National Wildlife Refuge System. Impacts are potentially biological, social, philosophical, economic, and political; however, we only address the biological ramifications of the trapping program.

Trapping of some species can be justified based on human health and safety issues whereby trapping can reduce the likelihood of disease outbreaks, such as rabies. Trapping can also be justified based on human values placed on some species (favorable or unfavorable) by reducing populations of some animals that compete with human interests (like predators) or animals that can cause other damages (like beavers). How much value any of these type of factors have at any given time or place are difficult to ascertain; however, it is certain that regulated take of a variety of furbearer species can have a wide range of environmental effects, both on the human and the natural environment. Some of these include: 1) reduced numbers of furbearers can negatively affect wildlife viewing opportunities for those species (such as coyotes) while potentially increasing the availability of prey species (such as snowshoe hares) or other non-harvested predator species (such as great horned owls); 2) protection of beavers can increase wildlife viewing opportunities for the species as well as for waterfowl and other species that benefit from impounded areas; however, it can also result in increased impoundment of waterways used by anadromous fish such as silver salmon, which can result in impacts to sport, subsistence, and commercial fisheries, as well as impacts to animals such as bears dependent upon the salmon as a food source; 3) removal of wolves (extirpated from the Refuge area early in the 20<sup>th</sup> century) could have helped with the establishment of coyotes which may have contributed to the current near absence of red foxes (due to significant, and often with fatal results, competition among canid species); 4) removal of wolves can benefit prey species such as moose; however, if adequate wintering habitat does not exist (a primary limited factor for the moose population) an artificially high moose population can crash during a severe winter because of over-browsing; 5) removal of lynx can result in increased populations of snowshoe hares, but too many hares can compete with moose for available browse during winter. Other impacts can potentially occur to the health and sustainability of individual furbearer populations. The Kenai area has been trapped significantly for over 100 years and has increasing human populations and access to many remote areas. During this time there have been numerous periods of closure to allow furbearer populations to recover from harvest efforts. Some species have been targeted more than others, are more readily captured than others, and/or have a greater ability to recover from low numbers than others. All of these factors must be routinely evaluated by managers to assure healthy and sustainable furbearer numbers and an acceptable trapping program.

The general status of Kenai NWR furbearer populations are;

Species	Current Status	History, Habitat, or Management Concerns
wolf	stable; est. 100 – 200	extirpated ~ 1910-1940; returned ~1960-1970; impacted by domestic canid diseases and parasites

coyote	stable to increasing	rare to absent before 1900; currently well established
lynx	population low	population responds to snowshoe hare cycle, currently low
wolverine	uncommon	large range and low numbers warrant special management attention
weasel	common	found throughout the Refuge – generally harvested incidentally to other species
river otter	stable	concentrated along rivers and lake systems with anadromous fish streams
mink	stable	found around wetland and riparian areas
red fox	extremely rare	widely sought after early in the 20 <sup>th</sup> century – now near absent from Kenai NWR and surrounding areas
beaver	stable to increasing	found on most larger lakes and streams
muskrat	stable	associated primarily with small ponds, lakes, and streams – may be impacted by severe winters
squirrels & marmots		red squirrels common, ground squirrels rare, flying squirrels absent; marmots limited in range to alpine areas
marten	rare	concentrated in small portion of Refuge; may be limited by habitat

Direct impacts to targeted species are not the only impact associated with trapping. Non-target species can also be injured or killed. Moose and caribou have been caught in large snares and a variety of small animals have been caught in leg-hold and conibear traps. The most common smaller non-target animals are those found in the same areas frequented by furbearers during winter and include ravens, gray jays, bald eagles, red squirrels, snowshoe hares, and spruce grouse. Techniques and permit stipulations, taught in classes and included in Refuge trapping permits are directed at minimizing non-target catch (such as use of break-away snares and prohibition of the use of visible bait).

The non-target catch of dogs was a concern prior to the late 1980s when the Refuge completed its furbearer management plan and instituted new requirements, including a closed area buffering trail-heads, facilities, and roads. After this, the incidental catch of pets has not been an issue.

**Public Review and Comment:** This compatibility determination has been prepared while revising the Refuge's Comprehensive Conservation Plan and Environmental Impact Statement. Future revisions can be accomplished outside of this planning process if deemed necessary and would be completed with public notice and involvement. Legal notice of the draft compatibility determination was published in the Anchorage Daily News and the Kenai Peninsula Clarion on February 25, 2007 which initiated a 45-day public comment period. The notice was also posted on a bulletin board at the Refuge headquarters for the same time period, made available starting February 28, 2007 on a list server [fws-akrefugecompatibility@lists.fws.gov](mailto:fws-akrefugecompatibility@lists.fws.gov) to 137 addresses, and made available on the Regional Refuge Planning web site at <http://alaska.fws.gov/nwr/planning/completed.htm>.

Comments on some or all of the (15) compatibility determinations were received from: The State of Alaska, The Wilderness Society, The National Wildlife Refuge Association, Friends of Kenai National Wildlife Refuge, Alaska Trappers Association, Defenders of Wildlife, Kenai Field Office (FWS), and The Humane Society of the United States.

The State of Alaska supported the draft compatibility finding for trapping but expressed numerous concerns about various aspects of the draft determination. They desire to eliminate, where possible, inconsistencies between State and Refuge regulations or permit requirements and reminded us of our commitment to work towards any necessary regulation changes through the Alaska Board of Game process. Species specific information shared by the State included: (Marten) "Marten are most likely limited on the refuge due to a lack of suitable habitat and are plentiful elsewhere on the Kenai Peninsula (GMU 7) where more available habitat exists." (Red fox) "Red fox are likely limited due to competition with and/or predation by coyotes and wolves." (Wolverine) "There are no data to show that wolverine populations are any higher or lower on the Kenai Peninsula than they ever have been, although research on wolverine populations on the Kenai Peninsula is currently underway by ADF&G, which may shed more light on the topic."

The Alaska Trappers Association submitted comments similar to the State of Alaska and expressed concern about Refuge regulations and inconsistencies with State regulations. They appreciated that the Refuge found trapping a compatible use but had a variety of concerns about how trapping is currently administered. They requested the Refuge conduct a rigorous and comprehensive review on the status of red fox on the Kenai Peninsula in cooperation with ADF&G and believe that red fox are poorly represented, but not rare, as characterized in the compatibility determination. The Association felt that marten on the Refuge should be managed as part of the population of the entire Kenai Peninsula and expressed an overall concern that the compatibility determination suggested that the Refuge is a unique ecosystem which they found to be biologically disingenuous.

The National Wildlife Refuge Association supported the draft trapping compatibility determination as written as did the Friends of Kenai NWR who specifically supported no take of red fox on the Refuge, restrictions on wolverine trapping in Game Management Unit 15A, and research on marten and restrictions on marten trapping in Game Management Unit 15B. The Wilderness Society also strongly supported the proposed restrictions on the trapping of marten,

red fox, and wolverine as outlined in the draft compatibility determination. Defenders of Wildlife also supported the proposed restrictions on the trapping of red fox, marten, and wolverine in certain areas, but also expressed concern that with real and anticipated budget shortfalls that the Refuge should prioritize uses which contribute most to Refuge purposes (implying that trapping may not be a use that the Refuge should continue to manage for during lean budget years).

Trapping has a long history on Kenai NWR and throughout Alaska. Fur animal populations have undoubtedly fluctuated naturally over time and in all likelihood some have also been affected measurably by human activities whether directly through harvest or through indirect activities that may affect habitat or prey abundance. Different species require different management strategies, but the primary interest of the Refuge is that all species that may be harvested also have a demonstrable harvestable surplus available. This is the specific concern raised regarding red fox, marten, and wolverine. We support managing wildlife based on ecosystem functions rather than artificial boundaries; however, Refuge purposes do not allow species uncommon on the Refuge, but common elsewhere, to be taken as though they were also common on the Refuge. This is not only a mandated legal purpose of the Refuge, but also a good long-term strategy to ensure diversity of species over time as areas with less protection may lose natural diversity. It is also helpful to know why a species may be found in low numbers, but management actions should generally be applied when species are found in low numbers.

Compatibility concerns are largely addressed through the Refuge's furbearer management plan and permit requirements and conditions. In the absence of such management guidance and stipulations, trapping may not be compatible on Kenai NWR. Re-evaluation of the plan and trapping stipulations should be undertaken periodically. Species specific status information should also be collected and evaluated on a regular basis. Should changes be deemed necessary at any time concerning the take of fur animals or other wildlife, we will first coordinate with ADF&G to cooperatively address the issues and bring any appropriate proposals to the Board of Game if necessary, consistent with a Memorandum of Understanding between the Fish and Wildlife Service and ADF&G.

**Determination (check one below):**

Use is Not Compatible

Use is Compatible With Following Stipulations

**Stipulations Necessary to Ensure Compatibility:** The continuation of management approaches currently employed is deemed necessary to ensure compatibility of the Refuge trapping program. This includes the continuation of compliance with the Refuge's furbearer management plan; following applicable State and Federal regulations; continued use of the required Refuge trapping class, permit, and permit conditions; continued monitoring and implementation of any necessary research; compliance checks and law enforcement; and periodic evaluation of furbearer population issues and trapping harvest information. Additionally, new attention should be focused on marten, red fox, and wolverine in order to ensure the Refuge is managing consistently with its primary purpose to conserve wildlife and habitats in their natural diversity. New research on marten is planned and the continued restriction on trapping of marten in their only known significant use area on the Refuge (GMU 15B near Skilak Glacier/Russian River) is a condition of the Refuge trapping permit. Some new restrictions may be necessary to ensure protection of other less common species such as red fox and wolverine and allow for potential population growth or pioneering into new areas. Under its Memorandum of Understanding with the Alaska

Department of Fish and Game, the Service cooperatively manages the fish and wildlife resources of the Kenai Refuge. The desired approach of the Service is for the Board of Game to implement any proposed closures or other changes in harvest regulations on the Kenai Refuge. If this is not possible, the Service will consider other alternatives such as modifying permit conditions or establishing appropriate federal regulations.

**Justification:** The trapping program at Kenai NWR has received significant public attention within the last 20 years with thousands of public comments received during its furbearer management planning process completed in 1988. The program has many guidelines that have proven successful and is a model of a large trapping program administered on a large area of public land bordered by a large and growing human population. Standards have been put in place that educate trappers and direct the program not only to ensure biological considerations are evaluated, but also those other significant issues that impact the program, such as concerns for safety and animal welfare. The compromises employed have worked well and can continue to be implemented to ensure a compatible public use on the Refuge, amended only slightly to include minor additional restrictions, if necessary, to help address conservation concerns for less common species.

**Signature (Refuge Manager):** /s/ Robin L. West 6/13/07  
Signature and Date

**Concurrence (Regional Chief):** /s/ Todd J. Logan 8/14/07  
Signature and Date

**Mandatory 10-year Re-evaluation Date:** 8/14/17