

July 30, 2015

TO: Alaska Board of Game  
FROM: Denali Citizens Council and Alaska Wildlife Alliance  
SUBJECT: Comments in support of ACR #7 – August 7, 2015 Board Teleconference

Chairman Spraker and members of the Board of Game,

On behalf of our directors and over 600 members, we appreciate the opportunity to provide comments. We urge you to grant the ACR (#7) we filed asking the Board of Game to consider a proposal to *prohibit the take of wolves on certain lands in Unit 20, adjacent to Denali National Park* at its March 2016 meeting. With the ACR, we submitted a map of the area to be considered for closure. The map includes lands in the Stampede townships and along the Nenana Canyon formerly closed to the take of wolves by the Board of Game. We also submitted a draft proposal that we would like to be considered at the Board of Game's only 2016 regulatory meeting.

By request, we will confine our comments in support of this ACR to the criteria of acceptance as specified in 5 AAC 92.005.

**a. Conservation purpose or reason – low numbers of wolves in Unit 20C**

- i. Although natural cycling is expected in wolf populations, the numbers and densities of wolves in GMU 20C (which includes Denali National Park and lands north of the park extending as far as the Tanana River) have been low and in recent years below the Department of Fish and Game fall density objective of 11/1000 mi<sup>2</sup>.
  - a. The Department's most recent survey of wolves in 20C outside Denali (2012) came up with a spring density of 4.1/1000 k<sup>2</sup> (10.7/1000mi<sup>2</sup>), just barely meeting the objective. *No data were collected for fall, but see NPS data in (b).*
  - b. Denali National Park, which occupies a good third of GMU 20C, conducted spring and fall surveys in 2012, confirming similar low densities (3.8/1000k<sup>2</sup> in spring, 3.1/1000k<sup>2</sup> in fall). It is notable that there was no increase through pup production between spring and fall in 2012.
  - c. Although the Department of Fish and Game does not conduct regular wolf surveys in 20C and has not published wolf survey data for 20C since 2012, scientists at Denali National Park have collected data on NPS lands since the 1980s in both spring and fall. These data show that, since 2012, spring wolf numbers and densities have continued to decline and remain below 11/1000 mi<sup>2</sup>. The most recent density estimate was in spring 2015, at 2.8 wolves/1000 k<sup>2</sup>. In early summer 2015, the Denali National Park wolf population was 46.
  - d. Wolf population numbers in Unit 20C as a whole are likely to be similar to those reported for Denali National Park. In any case, the Department has no data to indicate that wolf densities in any part of 20C are greater than those provided by National Park researchers.
- ii. For us, the reduction of wolf numbers in Unit 20C is a conservation concern because numbers are not meeting Department objectives, given the data we have for 20C. We know that the Department has stated that the wolf population as a whole in GMU 20 is healthy. However, for us, a conservation concern does not require a "unit-wide or population level" drop, but can exist at the subunit level. We note that other ACRs introduced for this teleconference deal with subunit conservation issues.

- iii. For us, this subunit-level conservation concern is about what many Alaskans value and want to retain in Denali National Park – the opportunity to view and study wolves in a relatively undisturbed predator-prey system, and the wish of many Alaskans that the Board of Game will support that opportunity. For many Alaskans this is about conserving a certain collection of wolves that den inside the park. Yes, there is dispersal but there are also known groupings of wolves that have historically used Denali National Park for denning and that attract visitors from around the world.

**b. To correct an error in regulation** N/A

**c. To correct the effect on a hunt that was unforeseen when a regulation was adopted.**

- i. The Director of the Division of Wildlife Conservation has already stated in his comments on ACR #7 that changes in bear hunting regulations (allowing the take of brown bears at black bear bait stations) promulgated by the Board in 2012 had the unforeseen effect of bringing more hunters into the field during the spring bear baiting season, at a time when wolf hunting season is still open. During the most recent season, when there were bait stations on state lands just outside the National Park, wolves visited one of the stations and two East Fork pack wolves were killed. We agree that the presence of hunters and bait stations created an unforeseen effect on wolf take in the spring, during a time when wolves take predictable extraterritorial forays outside Denali Park. This situation was made even more critical by the placement of the East Fork den close to the park boundary and bait stations. Additionally, these wolves had the potential to be most viewed by park visitors, through the placement of their den. The board should have the opportunity to consider this new information at its earliest opportunity, which would be March 2016.
- ii. Finally, when in 2010 the Board of Game instituted a five-year moratorium on consideration of “no wolf take” proposals for state lands adjacent to Denali National Park, the Board itself had the expectation that an Interior Region Board of Game Meeting would occur in 2016, and set the moratorium to expire in time for that meeting. However, in January 2015 the Board of Game changed the cycle of its meetings, with the result that the next Interior Region Board of Game Meeting was moved to 2017, creating the unforeseen consequence of increasing the moratorium from five to six years. Since 2010, the National Park Service has conducted studies on the effect of breeder loss and the effect of hunting/trapping closures on viewability of park wolves, studies that were an effort to address concerns the Board of Game brought up in 2010. These studies are now complete or in review. Alaskans who consider this issue important expected that the Board would convene to hear new data on this issue in 2016. We ask that you make that possible by granting ACR#7.

Again, thank you for the opportunity to submit these comments. Questions may be directed to us at our emails, given below.

Sincerely,

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