



*Advocating for Denali's Wilderness, Wildlife and Way of life.*

September 4, 2015

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Mr. Kirchhoff and Mr. Viavant;

On behalf of the approximately 300 members of Denali Citizens Council (DCC), thank you for the opportunity to read and comment on the Draft Alaska Wildlife Action Plan 2015. Our members include local, regional and national citizens with a keen interest in protection of wildlife and habitat both within Denali National Park and on state and borough lands adjacent to the park.

This plan is a compilation of a great deal of research and is very interesting and informative. The lists and tables are useful and compelling. The living nature of this process is well described and committed to. New species of conservation concern can be added and projects be developed under the strategies identified here. The document addresses the importance of maintaining ecosystem health, from top predators to primary producers. The document exemplifies the importance of interagency cooperation in utilizing research from a variety of sources to compile lists of at risk species. We commend all these aspects of the plan.

To be commended, also, are your criteria for designation of species of greatest conservation need (SGCN). Your criteria here don't simply include being at risk for extinction or severe population decline, but other important considerations such as stewardship species (those which occur primarily within the borders of the state), culturally important species (some of which may be hunted or trapped), economically important (mostly fish), and sentinel species (indicators of overall system health). This analysis will ensure that species will be considered for monitoring and protection from a variety of perspectives, and before it is too late. If there are funds and the will to employ these criteria in a robust way, they will protect not only the species listed but other species that depend upon them.

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However, there remain some perplexing conflicts both stated and suggested by this Draft Plan. What follow are our suggestions for making the Final Plan better.

**1. Clarify the scope and influence of this plan within the Department of Fish and Game.**

The Draft Plan states that, traditionally, the focus of the State Wildlife Grants program (which funds the Wildlife Action Plan) has been on identification of species of conservation concern in non-hunted species. This limits the scope of the Wildlife Action Plan. Was this the intent of Congress when it established the SWG program? Can you be sure that hunted species are well enough managed by the game management wing of the Department to protect them?

**2. State frankly whether the Wildlife Action Plan can mobilize sufficient funds to effectively implement its high-minded ideals?**

Or, will SWG funds be eaten up killing Elodea and rats?

The Final Plan, in its discussion of Priorities, should make this clear. Although dealing with invasive species has high priority, will there be enough money for important monitoring activities and programs? We realize that this may be difficult, but please try to be a bit more specific in the Final Plan.

**3. Recognize the rapidly evolving nature of climate change and its impacts.**

It is clear to us that the next several decades will be critical for maintaining biodiversity and protecting important species as Alaska continues to grapple with climate change. We looked for, found, and appreciate your thorough treatment of the current and future impacts of climate change to Alaska's habitats and wildlife. These changes will affect all jurisdictions, including federal, state and native lands. Cooperation amongst agencies and governments will be vital for achieving the conservation goals expressed in this document. Somehow, the differences in vision between state and federal managers will have to be bridged when it comes to fulfilling the vision of this plan. How this will be accomplished is not detailed in the Draft Plan. However, a commitment to making it happen should be crystal clear in the Final Plan.

**4. Commit to including all Alaska species as eligible to become SGCN (species of greatest conservation concern), not simply non-game species.**

The rationale given in the plan for not generally including hunted species, such as caribou, moose, muskoxen, wolves, wolverines and brown bears, was that many hunted species receive generous funding for their management and conservation through alternative federal (Pittman Robertson) and state (license and tag fees) funding sources. The plan assumes that the hunted and trapped species are "currently receiving significant research and management attention" (p. 22), and would exclude them; but ... "Hunted or trapped species that have inadequate funding for research and conservation are included. Should there be significant conservation concerns raised with other hunted species in the future, there is a process by which new issues/species not identified in this action plan can still be proposed and approved for SWG funding." We ask that the Final Plan provide more information on the process of including hunted species in SWG funding. At this

time, we have serious doubts that all hunted species are receiving adequate research and management attention under non-SWG funding models.

Better yet, all Alaskan wildlife and habitat should be subject to the parameters of the Wildlife Action Plan 2015. It is quite possible for a species managed with Pittman-Robertson/license funds, to become an SGCN, despite its supposed protection under research and management activities paid for by those funds. We have this concern because the mission of the game management side of the Department is not ecosystem-level conservation, but conservation of species to provide hunter opportunity. Regulations promulgated by the game management side could lead to depletion of predators and furbearers. The Draft Action Plan even hints at this, when on page 43 it states, “Trapping for most furbearers, in most areas of the state, does not have bag limits and unsustainable take can occur.” The Action Plan 2015 should strongly emphasize the importance of hunted species and should firmly grasp the opportunity to apply its criteria to these species, along with all the very important and diverse non-hunted species across the state.

**5. Accept our support for inclusion of specific species of conservation concern at Denali**

Based on years of experience in the Denali Region, we would like to confirm the listing of species whose numbers, from our anecdotal records, have declined and should be considered as SGCN for Central Alaska Range. We note that most already occur on your list and urge you to continue monitoring them as sentinel for climate change. The first three are birds who prefer moist tundra, and have been disappearing in Denali National Park.

The Whimbrel

The American Golden Plover

The Surfbird

The Dall’s Sheep – we urge you to consider this animal, the subject of so much concern on the hunting side, to be carefully monitored as a possible sentinel for climate change.

**6. Acknowledge that conservation issues and problems cross jurisdictions and commit to cooperative actions during the life of this plan.**

The *Introduction* (p. 1) celebrates the “long history of cooperation between the federal government and the states to manage and conserve wildlife species.” Federal funding, as the Draft Plan points out, has long been important to wildlife management in Alaska, not only for the pure conservation described in this plan, but for hunting and trapping regulation under the Fish and Wildlife Fund. It is refreshing that the Draft Wildlife Action Plan sees this federal-state relationship as a positive one, especially in a political climate where the term ‘federal overreach’ is still commonly used by Fish and Game representatives, and federal conservation units are criticized by Fish and Game representatives for their ecosystem-level management policies. As an organization that operates on the boundary of a National Park, DCC sees this type of conflict played out on a regular basis. We hope this plan will unequivocally commit to cross-agency cooperation on tough issues of conservation of species.

**7. Recognize the “conservation conflict” within the Alaska Department of Fish and Game.**

As a local organization with long term knowledge of user conflicts at the boundaries of Denali National Park, the Denali Citizens Council has on many occasions encouraged the Department of Fish and Game to support conservation of species that breed and spend much of the year inside the park, but venture onto lands outside the park. This sort of ecosystem-level species protection is clearly advocated in the Wildlife Action Plan 2015, however it is distressingly absent when we approach managers, biologists and the Board of Game to increase their monitoring and protection of these animals.

For example, with respect to the situation for wolves who den in Denali National Park and venture onto lands northeast of the park, we have asked for relief of hunting and trapping pressure on lands just adjacent to the park to preserve the opportunity for research and enjoyment of an un-hunted population of wolves, whose numbers are at an extremely low level now in 2015, attributable to a number of factors which include climate variables, prey availability and hunting pressure. We understand that the conservation concern here is not one of large-system extinction, but we do view these wolves as fitting into the criteria for SGCN because of their economic and cultural value for researchers and national park visitors, and because their low numbers and density should trigger the type of increased monitoring that SWG funds provide (and that Pittman Robertson funds should provide, but do not). Already, it is clear to us that the Department has not allocated much funding to study these wolves (Unit 20C), under Pittman Robertson/state license funding. The last survey of 20C wolves was in 2012. By contrast, the National Park Service wolf program has extensively studied wolves that den in the park and venture into Units 20A and 20C, and maintains good data. If these wolves could be subject to funding under the Wildlife Action Plan, both the state and the national park would clearly benefit. However, because of constraints on the Action Plan and policy problems on the regulatory side of Fish and Game, such funding seems unlikely.

The situation with these wolves points to the conflict over the term “conservation” that exists **at the core** of the Alaska Department of Fish and Game. While the Wildlife Action Plan 2015 casts a wide net, lists specific criteria for identifying species of conservation concern, and employs a cooperative, interagency approach, the hunt managers and Board of Game appear to seek a variable and subjective interpretation of “conservation concern,” especially when it comes to predators. Those on the regulatory side simply wish to look at wolves as a whole group of animals that have an effect on hunter opportunity, not as regional entities with regional conservation problems. For example, at a recent meeting on August 7<sup>th</sup>, 2015, to consider ACRs for the March 2016 Board of Game meeting, Attorney Seth Beausang stated, to members of the Board of Game, regarding criteria for accepting Agenda Change Requests “...because you haven’t defined ‘conservation purpose or reason’ ...it doesn’t seem to me that you have to interpret that as an emergency reason, you certainly have the discretion to interpret that broader, it is really up to the Board in what the Board thinks is a conservation concern...” When it comes to “hunted species,” and especially predators, the Board of Game has so much discretion regarding how to determine a conservation concern as to make the concept of “conservation,” on the regulatory side of the

Department of Fish and Game, at best vague, at worst prejudicial. Whether the Department wishes to continue to place decisions on what constitutes a “conservation concern” for hunted predator species under so much discretion, within a body of non-scientists, politically appointed, is a question of extremely high importance.

We are glad that the Wildlife Action Plan and SWG funding are taking care of the rich diversity of species on Alaskan lands and habitats. However the strong conservation language embodied in this plan seems relatively ineffectual for dealing with regionally-depleted predator species with important scientific, economic and cultural value to the state.

Can the plan be made stronger in this regard, or will the Department continue its inconsistent approach, highly concerned about conservation on the one hand and devoted mostly to hunter opportunity on the other, with a vague “tip of the hat” to conservation?

Thank you for the opportunity to comment.

Sincerely,

/s/ Nancy Bale  
DCC Board Chair