



Alaska Department of Fish and Game
Boards Support Section
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Delivered by email to: dfg.bog.comments@alaska.gov

March 4, 2016

Dear Alaska Board of Game Members;

On behalf of the board and more than 300 members of the Denali Citizens Council (DCC), I am submitting these comments on Proposals for the Statewide Regulations Meeting in Fairbanks from March 18-28th.

Most of DCC's Alaskan members live in communities near Denali National Park and Preserve, and are especially concerned with proposals on lands in GMUs 20A and 20C. Our goals include protection of wildlife crossing the boundaries between the national park and state lands, managing of off-road motorized access to retain quality backcountry experiences, and, overall, ensuring that intensive management is applied according to sound science. We've appreciated it when the Board took positions that support our goals.

As you know, we submitted two ACRs to bring a 'wolf buffer' proposal before the Board of Game in March 2016. The ACRs were considered in August 2015 and in January 2016, and were not forwarded. We support a 'buffer' to provide protection for wolves who den in Denali National Park and venture onto state lands adjacent to the park. The movements of these wolves have been plotted and mapped by the National Park Service under its ongoing wolf ecology program, which has collected an unbroken stream of data since the mid-1980s. These data show that, in general, wolves venture a certain distance, then return to the park, and a relatively limited buffer zone on state lands adjacent to the northeast corner of the park could effectively prevent pack disruption without significant loss of hunter/trapper opportunity. The Board of Game has established buffer zones in the past, and has the authority to do so now and in the future. We feel that buffer zones are the only way to ensure the ultimate protection of vulnerable wolf packs, especially those wolves who den in the eastern portions of the park. This in turn will increase the opportunity that tourists from around the world can view them.

Although a buffer will not be available as a proposal to the Board of Game in 2016, there is another proposal that could help these wolves, and we support it, as does the Middle Nenana Fish and Game Advisory Committee.

Proposal 141, submitted by the National Park Service, would shorten the wolf hunting season in a portion of Unit 20C, ending it on April 15 rather than May 31st.

Shortening the season will remove hunting pressure on wolves in this area during one of the most vulnerable times in their year, when more hunters are in the field and when pregnant wolves are afield. This proposal was intended to deal with the unanticipated effects of recently adopted bear-baiting regulations, bringing brown bear baiters into the field as early as April 15th, thereby increasing the number of hunters and the risk that a wolf would be shot. This risk is not theoretical. In spring of 2015, two wolves of the East Fork Pack, a well-known and viewed pack, were shot on state lands north of the park, near a bait station. Another died with a snare around its neck. The East Fork Pack did not den in 2015. Pack disruption through the death of a breeding female, one of the two shot, was suspected. Over the spring-fall 2015 season, the number of individuals in the five wolf packs that inhabit the eastern part of Denali Park experienced no increase and remained at very low numbers.

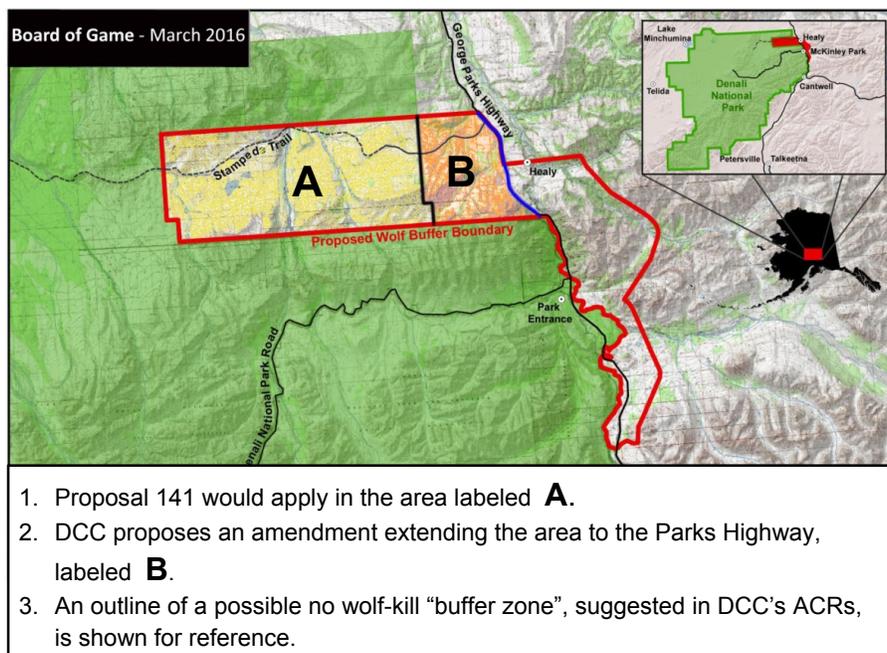
Although hunter take is not the only cause of population decline in wolves, and is considered to be low in this area, the NPS makes a good point in this proposal, as follows; "*Although wolf populations may be able to compensate for losses from low levels of harvest through increases in reproduction or immigration or reductions in emigration,*

at low densities, the ability for the wolf population to compensate through movement in or out of the population is limited by fewer wolves available. The wolf population in Denali National Park and Preserve is currently low and the effect of additional harvest, particularly during the season when females are pregnant, can remove the reproductive capacity for entire packs as seen this previous spring.”

We have been told that the Department of Fish and Game “does not manage for individual packs,” however these individual packs in Denali National Park have added value because of their importance for tourism and scientific study, and because Alaskans have written and petitioned you countless times on their behalf. Given their low numbers and the risks to them at this moment, we think the solution provided in Proposal 141 is essential and we support it.

Below we present four amendments designed to enhance Proposal 141. Every amendment can be implemented by itself, or they can be taken together. We ask that you consider each one closely.

1. **Apply this change in hunting season length to the 2016 hunting season.** This would avoid having to perform an Emergency Closure in 2016, as happened last year. The current hunting bag limit of 10 wolves makes it possible for additional pack disruption to occur this year, especially if more than one wolf is attracted to a bait station.
2. **Enlarge the size of the area covered by the regulation to include the entire Stampede townships up to the Parks Highway.** This incorporates more of the wolves’ range directly north of the park, all of which is open for bear-baiting. *See map below for a depiction of this amendment.*
3. **Change the date of hunting season closure to an earlier date, to better protect pregnant females.** Pregnant wolves can be afield as early as mid-March. Please discuss among yourselves the possibility of closing wolf hunting earlier, to protect these wolves - on April 1st or March 15th.
4. **Close wolf trapping earlier, to coincide with the closure of hunting.** Under current regulations, trapping does not end until April 30th, there is no bag limit, and wolves can be shot from the trap line, putting pregnant wolves at significant risk. Whatever date you determine for closure of wolf hunting, we recommend that you close wolf trapping on that date as well.



The above amendments make Proposal 141 stronger, and we hope you will support them. We also support Proposal 141 without amendment. However, Denali Citizens Council believes that only a no-wolf-kill buffer similar in size to what is shown on the map will adequately protect wolves who den in Denali.

We have a few more recommendations, given below:

Proposal 67 - Support

This proposal is a common sense offering preventing hunting/trapping on a public right of way without consent.

Proposal 68 – Support

This proposal would make it unlawful to use high-tech night imaging and scoping devices for hunting. We agree.

Proposal 71 – Support

This proposal makes it unlawful for a hunter to get advice about a hunt from someone else who had been airborne that day, making it a penalty for both the hunter and the same-day-airborne adviser. This will prevent the advantage created for hunters when a transporter or other individual who had flown that day could spot animals and then land and advise the hunter.

Proposal 78 – Do not support

This proposal would eliminate the use of trap ID tags now and into the future. It is too broad and works against a common sense regulation that is already enforced in many states.

Proposal 79 – Support

Requires a 24 hour trap line check. This will help to ensure the quality of the fur, prevent needless suffering, and ensure public safety in areas where people might be recreating near a trap line. As of now, trappers have no regulation requiring that they visit the trap line at any interval, although in several states a 24 hour check is law.

Proposal 80 – Support

Keeps trap lines out of cities larger than a certain size, and establishes setbacks from public trails. This is a common sense public safety regulation.

Proposal 87 – Do not support

This proposal would prevent the Board of Game from considering banning off-road vehicles using “quality of outdoor experience” reasoning. We do not agree. We think “quality of experience” is a strong and effective criterion to be used frequently in Board of Game decision making. We also strongly oppose the use of the intensive management law (AS 16.05.255(f)) to preferentially dictate land management decisions that most certainly involve “quality of experience” considerations.

Proposal 123 – No recommendation

With respect to reauthorization of the Unit 20A antlerless hunt, we understand that the department may not issue permits unless data shows an antlerless hunt is needed. This hunt has been suspended for two years. As you know, antlerless hunts have been exceedingly unpopular with local citizens who have felt that they put unnecessary pressure on limited trailheads and hunting areas.

Proposal 142 – Do not support

We do not favor using predator control to reallocate moose from wolves to hunters, but only as a way to assist a truly diminishing ungulate population. The IM law should not be dictating this type of allocation management. We are particularly concerned about the length of time that predation control can be authorized, until 2027. We think

the board should require financial analysis of this form of “hunter opportunity promotion.” Can the Department afford it?

Proposals 132-133 – Support

We understand that these proposals are intended to comply with Federal Regulations by moving from “no closed season” for hunting snowy owls and cormorants to seasons that span some months. We hope that the Department will continue to monitor these species and provide additional guidance to the board for conserving them. . They are listed in the ADF G Draft Wildlife Management Plan as “species of conservation need.”

Thank you for the opportunity to comment here. If any Board of Game member has questions, you may call me at the number below.

Sincerely,

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DCC Board of Directors

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