



DENALI CITIZENS COUNCIL
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Commissioner Sam Cotten
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

August 8, 2016

Dear Commissioner Cotten:

I am writing this letter on behalf of the board and members of the Denali Citizens Council (DCC), a grassroots citizen advocacy organization headquartered at the entrance to Denali National Park and Preserve. Founded in 1974, DCC encouraged citizen involvement in policy decisions as the park grew from an old-line railroad destination to the world-renowned focus of over half a million visitors yearly. DCC has also been a strong advocate for retaining quality of life on state and municipal lands at Denali's gateway.

One of our key programs has been to focus attention on the Wolf (Stampede) Townships, state land enclosed on three sides by the national park at its northeast corner. Our decades-long work in this region has included holding three Stampede Summits on the future of these townships. At these conferences, agency representatives and local citizens met and talked about how best to plan for these areas. Local people value the diversity of uses there, but want to keep the townships free of large projects that threaten their rural quality of life. For example, there was widespread local opposition to a railroad or road to Kantishna through the Wolf Townships when these ideas came up about ten years ago.

The Alaska Department of Natural Resources recently finalized the Yukon Tanana Area Plan, and DNR concurred that the two preferred uses for these townships were as wildlife habitat and for dispersed public recreation. To help support this vision, DCC has advocated for the formation of a State Recreation Area (SRA) in these townships. Formation of an SRA would lead to development of a management plan, would provide for state monitoring and enforcement, and would ensure that these public lands remain public. I personally know private landowners in the townships who support this idea. Currently, the SRA has no sponsors in the legislature and the townships are considered general use state lands.

Because of the position of these lands, surrounded by a national park and close to the major north-south transportation corridor in the state, their future as habitat and for dispersed recreation will be at risk without more proactive management. Access by snowmachine and ATV is widespread and there is little presence of state enforcement in the area (no DNR representative and the wildlife trooper is in Cantwell). The local borough government has no management role. The popularity of the national park has led to more visitation and tourism development in the Wolf Townships. Campers, mushers, hikers and hunters use the townships. Outdoor businesses operate there. Most of these folks want to see wildlife.

The State of Alaska and Denali National Park have a dual interest in working together to promote the core values of the Wolf Townships. The Board of Game has been helpful with some issues in this area. For example, the Board of Game declined to identify GMU 20C as an area for intensive management.

However, it has been and continues to be difficult for us to work with ADF & G on wildlife conservation themes for the Wolf Townships.

As you know, these state lands, by their position close to the national park, provide similar habitat and share fauna with the park, especially wolves and caribou that spend the bulk of the year inside park boundaries but venture into and out of the townships at key times. Although ADF&G has closed caribou hunting in the townships because of low numbers in GMU 20C, there is great reluctance to conserve wolves. For some reason, the Board of Game insists that there has to be a *population-level problem with wolf numbers* (an unclear concept) before it will act to protect wolves, and insists that it does not manage for “individual packs” of wolves. Therefore, even though wolf numbers are at unprecedented lows inside Denali (especially the eastern family groups), and additionally are low in the entire GMU 20C according to ADF&G’s most recent census (2012), the Board has maintained high bag limits (10 per hunter and no limit per trapper) and liberal seasons (Aug 10 – April 15).

Although two proposals for broader wolf conservation on state lands in 20C are on the Board of Game’s agenda for the February 2017 Region III meeting, we are concerned that the Board will dismiss these with only shallow reference. I was in attendance at the March 2016 Board of Game meeting, and I heard members of the Board of Game hint that the small change they made in wolf hunting regulations in 2016, taking six weeks off the spring season, was probably going to be all the Board would do for wolves in 20C. We can certainly show big declines, from NPS and ADF&G data, in wolf numbers and densities in GMU 20C. However, these are brushed aside as mere periodic fluctuations.

The two year demise of the East Fork pack is a pretty clear example of how hunting on lands adjacent to the park can damage this valuable resource, this “trophy of a different sort.” The losses this year when the East Fork collared male was shot at a bait station, precipitating the likely disintegration of the pack, have reduced an already low wolf population in this region. Existing regulations are insufficient to provide the broad protections that Alaskans have asked for.

You have heard all the arguments, I am sure. We’re particularly perplexed by oft-repeated statements that wolf conservation is “federal overreach” near Denali Park. This rhetoric suggests that wolf conservation is not aligned with state wildlife management values, or is somehow not supported by Alaskans. However, a quick check of state wolf management documents lists conservation of wolves as one management tool available to the department, and provides a management density floor of 11 wolves/1000 sq. mi., a density barely met in this region in recent years. All signs point to some sort of management action, action that has been taken before, when the Board of Game established closed areas next to Denali Park a little more than a decade ago. Our members and many Alaskans support wolf conservation on these state lands.

In line with our concerns above, the board and approximately 300 members of the Denali Citizens Council have the following requests:

1. Please institute an emergency order closing wolf hunting in that portion of GMU 20C that is surrounded on three sides by the national park, otherwise known as the Wolf Townships, as of August 10, 2016, when it is scheduled to begin, for the entire hunting season. Include hunting under a trapping license in the closure. Bear hunters will be in the wolf townships starting August 10th, followed by moose hunters on September 1st, so the risk is significant.

Justification: Density of wolves in GMU 20C, in both NPS and ADF & G surveys, is at or below the 11 wolves/1000 sq. mi. management minimum. Current bag limits of 10 wolves per hunter could endanger wolves traveling together, thus putting greater pressure on existing packs, many of which are already reduced in size. The role of bait station placements in attracting wolves could increase their vulnerability, even when stations are currently not active and theoretically cleaned up. It is unclear whether wolves, once attracted to a station, might habituate to that area.

2. We would like to continue communicating with you, and with the department, to discuss common sense strategies to manage use in the Wolf Townships. These include the following:
 - a. Ensuring enforcement of wildlife regulations with proactive staffing (nearest wildlife trooper is in Cantwell),
 - b. Ensuring that sealing is accomplished in a timely fashion and is an accurate reflection of “take” in the area (as you likely know, no sealing data has yet been recovered for the male collared wolf shot near a bait station in the wolf townships this spring). Perhaps the sealing data is still trickling in, but this adds to our concern that if sealing is not conducted in a robust manner, how can enforcement be robust?,
 - c. Developing messages that will dispel the erroneous assumption that conservation of wolves is not a state management value and tool, to be employed when needed. Embrace the view of many Alaskans that the wolf is an important living trophy.

3. I would like to invite you to DCC’s annual meeting in May 2017, where you can meet locals and discuss mutual issues. Before that time, I and other concerned locals would like to meet with you during the Region III Board of Game meeting in February. My contact information is below.

Sincerely,

/s/ Nancy Bale
907-244-2510

DCC Board of Directors

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