

Alaska Board of Game
 Alaska Department of Fish and Game
 Boards Support Section
 P.O. Box 115526
 Juneau, AK 99811-5526

February 21, 2020

Chairman Spraker and Board of Game members;

On behalf of the board and members of the Denali Citizens Council (DCC), thank you for the opportunity to comment on Proposals for the March 2020 Region III meeting. The Denali Citizens Council was founded in Cantwell in 1974 to represent local, regional and national citizens. Many of our more than 200 members either live full time or seasonally in Denali's gateway communities of Healy, McKinley Village and Cantwell or have lived in the Denali community and remain engaged in the region. Many have joined DCC because of our vision of a vibrant community, involved citizenry, and responsive government. Our five Directors own property in the Denali Borough and support the diversity of uses currently practiced on state lands. We recreate on public lands in GMUs 20A and 20C. All of the Directors have at one time or another worked within Denali National Park. We support the park mission but are not a "park friends" organization, and in fact we cooperate and disagree with the National Park Service (NPS) in about equal measure. We have, in the past, submitted proposals to the Board of Game, and continue to take positions on a variety of proposals. We think that citizen input on Board of Game decisions is vitally important for our valued Alaskan resources.

DCC Positions on selected proposals for Region III meeting March 6-14 – Fairbanks

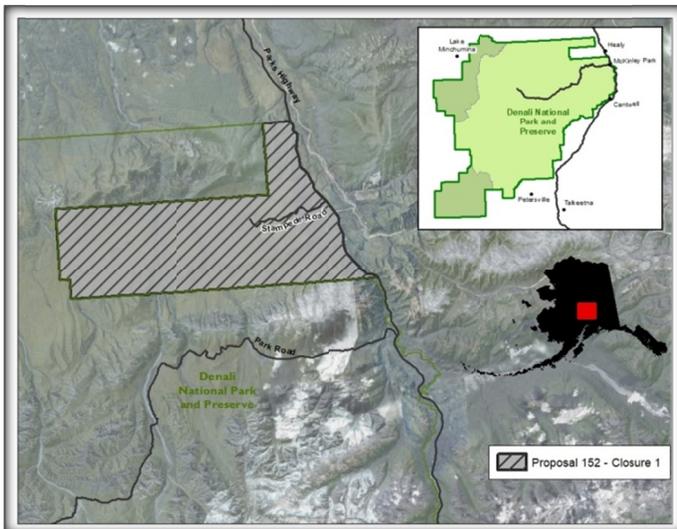
Region wide and Multiple Units

- **Proposal 47 - *No nonresident hunting of moose or caribou currently under an Intensive Management predation control program until harvest objective has been met.***
DCC Supports – We agree with Resident Hunters of Alaska that "Intensive Management when necessary is first and foremost about putting food on the table for Alaskans." Limiting the application of Intensive Management predation control efforts according to this Proposal is consistent with the intent of the Intensive Management Law and will prevent overly zealous use of that tool.
- **Proposal 48 – *Extend season for taking wolves in multiple units to start Aug 1, not Aug 10***
DCC opposes – We oppose this extension on many grounds, but most importantly, we think that applying such a change to multiple areas, where different relationships between predator and prey exist, is unscientific and extends an already unnecessarily long wolf season.
- **Proposal 51 – *Remove bag limit restriction of one Dall sheep every four years for nonresident hunters 60+ years old.***
DCC opposes – Given recent changes and threats to sheep populations, and the lack of any scientific data in this proposal we feel it is premature at best to change existing policy.

- **Proposal 54 – Reauthorize brown bear tag fee exemptions.**
DCC opposes – Given the nominal cost of this tag and ongoing budget challenges in the state, we feel it is not prudent to continue the exemptions.

Fairbanks Area Proposals (focus on 20C and 20A)

- **Proposal 122 – Reauthorize antlerless moose hunt in Unit 20A**
DCC supports in principle - However, given the stresses of winter on all moose, we oppose any general hunt that ends later than November 15th.
- **Proposals 127 and 128 – Change the boundary of the Wood River CUA to increase motorized access**
DCC opposes – DCC feels that the Wood River and Yanert non-motorized CUAs are well-designed and popular areas where hunters can enjoy a more traditional experience. We join the Middle Nenana AC in opposing both of these proposals.
- **Proposal 129 – Change dates of closure in Yanert CUA to align with Wood River CUA**
DCC opposes – We believe this will lead to a damaging level of ATV use during snow-free months in the Yanert Valley, a relatively narrow valley with one major trail. We doubt that very many folks will haul feed in winter by snowmachine, the less damaging option. Already, the existing trail is experiencing degradation. We do not want to see a repeat of Rex Trail impacts in the Yanert.
- **Proposal 152 - Areas closed to the taking of wolves near Denali National Park in Unit 20C.**
Proposed by the National Park Service, Denali National Park.



Closure 1: Closure would run from Feb 1 – Aug 10. Hunting season would begin Aug 10 and end Feb 1. Trapping season would run Nov 1 - Feb 1

We support Closure 1, as described in this proposal and depicted on attached map. This closure of approx. 200 sq. miles would cover the entire area of Stampede townships (a cutout of state lands surrounded on three sides by Denali National Park) up to the George Parks Highway.

There is a smaller option, Closure 2, which exempts portions of the Western townships. We oppose Closure 2 because of the complexity of administering such a remote open area.

We support the seasonal closure in Proposal 152 as a way to protect the integrity of wolf packs that den and spend summers in Denali National Park, and move onto state lands in the Stampede Townships during late winter and spring.

DCC's reasons for supporting the National Park Service in its request (Proposal 152) to establish a closure are listed below:

1. The Board of Game has the authority to manage wolves through both harvest and conservation.

In general the Board of Game has chosen to manage wolves for consumptive uses, but the Board has the right and responsibility to manage for conservation, where the public has asked and in areas where such conservation makes sense. We argue that the Denali region, and specifically the Stampede townships, are by history, science and public opinion the ideal state lands on which to practice non-consumptive use of wolves. Furthermore, there is nothing in the Board of Game policies that prevents managing at a sub-population level. In the case of Proposal 152, a closure is suggested that would reduce risk on identified subpopulations of wolves, something that the Board of Game is authorized to do, just as it does for hunting regulations with certain subpopulations of ungulates. This proposal is not about expanding the national park, but more about recognizing that the state can conduct closures in areas where those closures have been asked for, are justified through scientific study, and make sense.

a. **Duties of the Board of Game allow both opening and closing areas to hunting and trapping** (*AS 16.05.255. Regulations of the Board of Game; Management Requirements*)

b. **ADF&G management goals for wolves allow both use and complete protection.**

“...ADF&G will manage wolf populations to provide for human uses and to ensure that wolves remain an integral part of Interior Alaska's ecosystems. Compatible human uses include hunting and trapping (both for personal use and commercial sale of furs), photography, viewing, listening, and scientific and educational purposes (ADF&G 2002). The aesthetic value of being aware of or observing wolves in their natural environment is also recognized as an important human use of wolves. We also recognize that integral to wolf management is the premise that wolf populations are renewable resources that can be harvested and manipulated to enhance human uses of other resources. Management may include both the manipulation of wolf population size and total protection of wolves from human influence...”

Species Management Report and Plan ADFG/DWC/SMR&P – 2018-30
(available in ADF&G Research archive)

2. The first “Denali wolf buffer” was actually devised by the State of Alaska through a cooperative process in 1991-1992. Completing the process with a scientifically supported closure would honor long-standing intent.

The *Strategic Wolf Management Plan*, a cooperative effort under the auspices of the Department, was adopted by the Board of Game in October 1991, and led to the development of Area-Specific Wolf Management Plans.

The *Area-Specific Wolf Management Plan for GMUs 12, 20 and 25C* (Rosier and Kelleyhouse, March 1992), had the following goals:

- a. *To ensure the long-term conservation of wolves throughout their historic range in Alaska in relation to their prey and habitat.*
- b. *To provide for the broadest possible range of human uses and values of wolves and their prey populations consistent with wildlife conservation principles and the public's interests.*
- c. *To increase public awareness and understanding of the uses, conservation and management of wolves, their prey and habitat in Alaska.*

It was in this *Area-Specific Plan* that the original “no take area” of state lands along the northeast boundary of Denali National Park was proposed. Much has occurred since that time, including passage of the intensive management law, prohibition of same day airborne hunting, and the establishment and rescinding of “no take” buffers on Stampede lands by the Board of Game in the early 2000s. However, to this day, the values espoused in the language of these 1991-1992 plans provide a basis for Alaska Fish and Game management actions. These values do not emanate from some form of “federal overreach” or “national park expansion” but have a solid foundation in our own state wildlife management.

3. **The small area identified in Unit 20C (approx. 200 sq. mi. in Closure 1) for closure in Proposal 152 presents no wildlife management impediments to enacting wolf conservation.**
 - a. Wolf hunting and trapping in the area identified are not conducted according to the eight criteria for Customary and Traditional Use (5 AAC 99.010).
 - b. State lands in Unit 20C have relatively low densities of moose and wolves, according to the most recent management documents. No predation control management actions to increase numbers of ungulates have been contemplated for these lands over many years. Harvest objectives for moose in 20C have generally been met.
 - c. Similar densities of moose and wolves exist within federal and state lands in 20C.
 - d. *Closure 1* occupies a small portion of the total area of state lands in GMU 20C.

4. **Scientific data from over three decades of radio-collaring under the NPS Denali Wolf Program have shown a consistent pattern of back and forth movement of wolves between Denali National Park and state lands in the Stampede townships, placing more wolves on state lands during late winter and spring. It is during this time that Proposal 152 seeks to reduce risk on these wolves.**

The Denali Wolf program began using radio-collaring in 1986, to track movements of wolves that den in the national park and to gather comprehensive biologic data on a relatively un-hunted population of wolves. This program is known internationally, provides valuable information for both the scientific community and the general public, and shares information with the State of Alaska. Because of access to research grants and federal funds, the Denali Wolf program is able to produce an important record on these animals, something unique and valuable. Read about the program at <https://www.nps.gov/dena/learn/nature/wolf-research.htm>

The particular packs that foray into the Stampede townships include the Eastern Packs - Grant Creek, Riley Creek, Sunday Creek and Tekla. These are the packs most likely to be affected by hunting and trapping within the Stampede area. These wolves are not leaving the park because of diminished prey populations, but because of seasonal and weather-related availability of caribou. Some disperse, and collared wolves from Denali National Park have been found hundreds of miles away, but collaring data show that the Stampede area is crucially important to wolves that den, pup and summer in Denali National Park.

5. **The seasonal closure in Proposal 152 (*hunting season opens Aug 10, closes February 1st, shortening hunting season in most of the area by 2.5 months; trapping season opens Nov 1, closes February 1st, shortening the season by 3 months*) is meant to reduce risk to wolves on state lands north of the park at a time of year when the death of breeding wolves can most affect pack dynamics.**

A recent study indicated that the death of a breeding wolf, once pair bonding and breeding have occurred (a process that begins in early February and extends to birth of pups in May) can cause dissolution of the entire pack, with potential loss of productivity for the entire year. The study is available at <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2656.12256> . In a review described in this study, breeder loss preceded 77% of cases of pack dissolution. Hunting and trapping can be highly significant during the late winter and spring months. After all, in the lands concerned, bag limit is 10 per hunter, and trappers have no bag limit for wolf take.

We think the seasonal closure to hunting/trapping in Proposal 152 will provide enhanced protection for wolf families who den and spend summers inside Denali National Park, but travel into the area of the proposed closure predictably. Many of our members would prefer a full-year closure, but we've concluded that if the seasonal closure outlined in Proposal 152 enhances pack survival, we can support it. We are not arguing a biological problem or emergency for wolves in 20C. We contend, however, that state management actions in this small area of Unit 20C could be highly significant for the survival of wolf family groups in the eastern portion of Denali National Park, thereby promoting the opportunity of viewing these animals.

6. **Large numbers of Alaskans and wildlife advocates have asked for increased non-consumptive opportunities in the Denali region, which hosts visitors from around the world who hope to see wild animals in their natural habitat. Proposal 152 will enhance wolf viewing opportunity by allocating part of the year to non-consumptive uses.** This Proposal is about creating opportunity for the viewing public and the scientific community...not a guarantee, but an enhanced opportunity. As the Proposal states, these wolves are important to a wide array of citizens, local, regional and national. For many citizens, simply knowing that these wolves have been protected by the State of Alaska will be highly significant.

- 7. We have long hoped for a day when the State of Alaska and the National Park Service could engage in meaningful, cooperative management strategies. We believe Proposal 152, more than any previous proposal concerning wolf conservation next to Denali National Park, promotes such cooperation. Opportunities for both consumptive and non-consumptive users are provided within this proposal. If Proposal 152 is enacted, the State of Alaska can take credit for supporting wolf conservation in an area of the state where that conservation has had a strong constituency for thirty years.**

By passing Proposal 152, the Board of Game and the State of Alaska can deliver on its promise to consider all users and values in wildlife management.

Sincerely,

**Denali Citizens Council Board of Directors
PO Box 78
Denali Park, Alaska 99755
907-244-2510**

Nancy Bale

Steve Carwile

Nan Eagleson

Charlie Loeb

Hannah Ragland