

TO: The Alaska Board of Game
RE: Proposals for Region III Board of Game meeting in Fairbanks, AK in March 2024
From: The Denali Citizens Council (DCC)



The Denali Citizens Council, founded in Cantwell, Alaska in 1974, is a grassroots public education and advocacy organization whose focus is Denali National Park and its gateway regions. Many of our members live or have lived, worked and owned land in the region, and have a direct and personal interest in the national park.

On behalf of our members, DCC has commented over the past two decades on Denali-relevant proposals. We appreciate efforts by the Board of Game to limit motorized hunting in the Yanert and Wood River Valleys, and to limit the impact of bear bait stations on wolves in the Stampede area. The Board of Game, in the past, has recognized the conservation value of wolves who den and spend most of the year in the national park by establishing “no kill” areas (or “buffer zones”) on state lands bordering the national park.

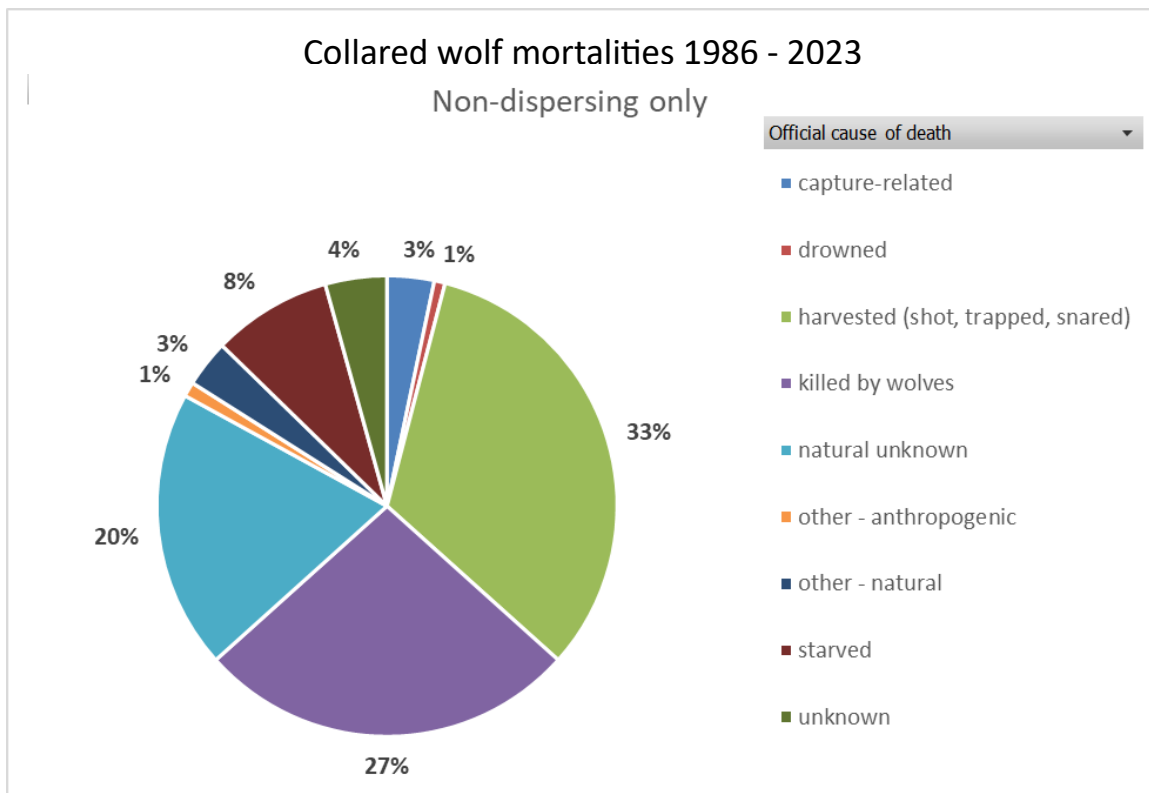
No such areas exist at this time, and we are advocating for their re-establishment by supporting Proposal 186.

We urge you to support Proposal 186 for the following reasons:

- 1. Non-consumptive values, such as wildlife viewing and scientific study, have been recognized as valid and important in Alaska wolf management. They are not “federal values” only, but are a solid part of the state management toolbox. These values are particularly important in the Denali National Park region where tourists come from around the world to view wolves.**
 - a. It has been recognized that the opportunity to view a wolf in its natural habitat is very important to Denali National Park visitors.
 - b. Tourism (which includes viewing large mammals) is an important part of the Alaska economy, bringing in millions of dollars each year (in 2022, Denali accounted for \$475 million in spending within Alaska).
 - c. The Denali National Park wolf monitoring program has continuously studied wolves who den and spend most of their time within the park, since the 1980s. The annual census and data on genetic, physical and immunological characteristics of wolves obtained in this program will be important for evaluating long-term changes in wolf populations throughout the state. There are no state programs that provide this degree of scientific evaluation on wolves. Part of what motivates the National Park Service to request a closure in the Stampede Townships (Proposal 186) is to maintain the stability of this study in a relatively non-hunted population.

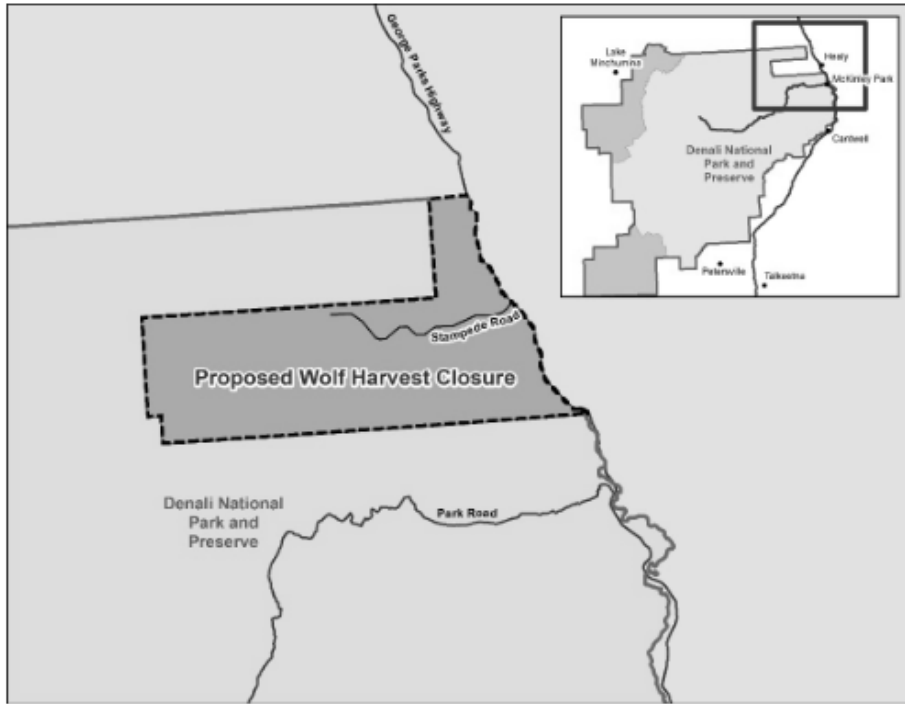
- 2. Our members and many Alaskans have attended and commented at numerous meetings since 2000 urging the Board of Game to remember the importance and relevance of these values. Proposal 186 responds to these values by closing the Stampede Area to hunting and trapping of wolves, reducing risk on wolves that are studied and enjoyed inside the national park when taking forays onto state lands close by. There is no area of the state better suited for such a closure, given the special value in the viewing and study of living wolves there. The Board of Game has long expressed that it is sensitive to public comment, and public comment from throughout the state supports this closure.**

3. We recognize that no closed area can protect all wolves that venture onto state lands, but we strongly believe that reducing the risk from hunting and trapping in the proposed closed area (see map) will promote stability in the Denali wolf population. The risk is real; long seasons (August 15-April 15 hunting/November 1-April 30 trapping) and high bag limits (10 wolves for hunters, unlimited for trappers) on state lands adjacent to the national park enhance the level of risk for wolves. Hunting wolves in August places young wolves, just out of the den and learning how to hunt, at enhanced risk. Surely there are other risks to wolves, but hunting and trapping risks are significant and can be managed. See image below, from *NPS data*.



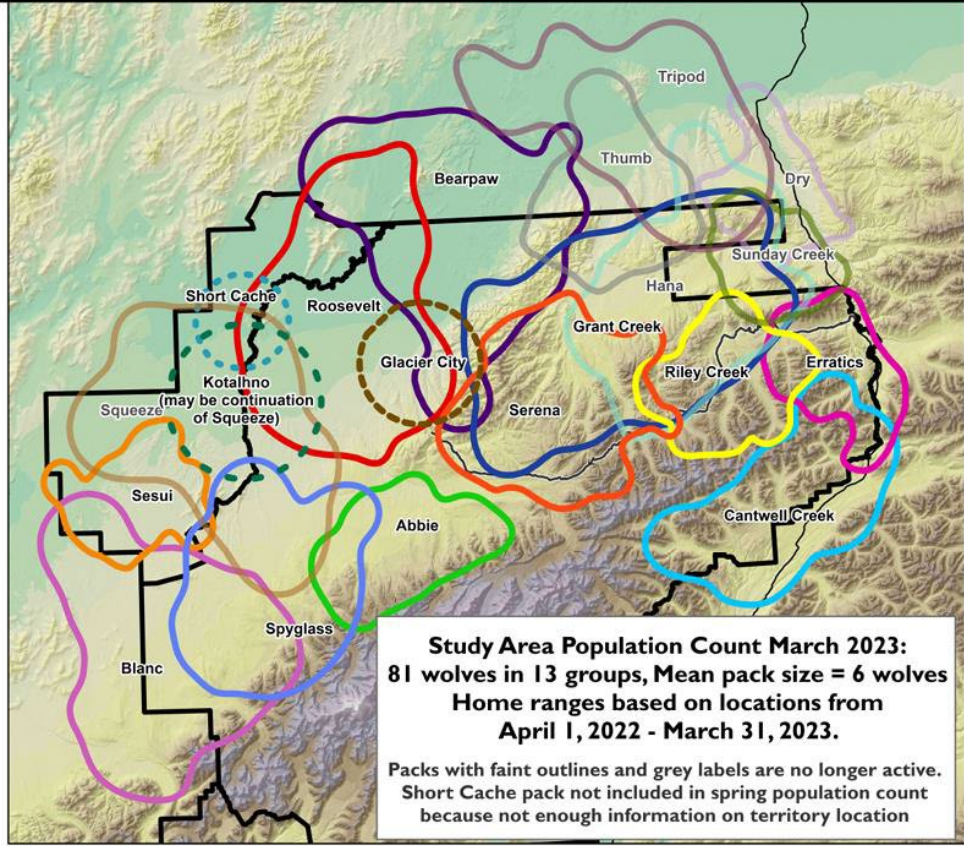
4. We accept that there is not a biological concern for the overall population of wolves in the Denali region. However, the loss of even one wolf has been shown to be disruptive to an entire family group, especially in early spring, after mating and before pups are born. Pack disruption and dissolution have occurred in the past following hunting/trapping losses. Maps below demonstrate the area of proposed closure and how the territories of wolves overlap it.

- a. Just recently the only three collared wolves from the Grant Creek pack have gone offline, appearing that they had been trapped and collars destroyed. Note that it is their territory that occupies part of the Stampede townships.



Spring 2023 Denali Wolf Map

National Park Service
U. S. Department of the Interior
Denali National Park and Preserve



Pack (Pack size as of 3/15/2023)

- Abbie (8)
- Bearpaw (7)
- Blanc (3)
- Cantwell Creek (4)
- Dry (0)
- Erratics (4)
- Glacier City (5)
- Grant Creek (9)
- Hana (0)
- Kotalhno (7) (may be continuation of Squeeze)
- Riley Creek (12)
- Roosevelt (7)
- Serena (6)
- Sesui (7)
- Short Cache (4)
- Spyglass (2)
- Squeeze (0)
- Sunday Creek (0)
- Thumb (0)
- Tripod (0)

0 10 20 40 KM

April 27th 2023

Study Area Population Count March 2023:
81 wolves in 13 groups, Mean pack size = 6 wolves
Home ranges based on locations from
April 1, 2022 - March 31, 2023.

Packs with faint outlines and grey labels are no longer active.
 Short Cache pack not included in spring population count because not enough information on territory location

5. **Historically, the Alaska Board of Game has recognized the economic importance of studying and viewing wolves in the Denali Park region, along with the desires of many Alaskans who support wolf protection there. The board has taken action on these matters, as indicated below:**
- a. 1990-1993 – ADFG held an extensive public process to establish zones for state wildlife management on state lands adjacent to national parks. Although a consensus was not reached, this process indicated a recognition by the State of Alaska that wildlife management could be different in different areas of the state, depending on distinct values present in those areas
 - b. Board of Game Interior Meeting March 2000 – Proposal 80 asked for a small, “no kill” area west of the Savage River in the Stampede Townships. The Board of Game amended this proposal to reduce the area, and stated that *“although this is an allocation issue between wildlife viewers and trappers, the department recommend implementation of this proposal as an initial step in a process to provide for a wide array of wildlife values held by Alaskans. It considered this action would result in a long-term benefit to trappers because of fostering a public climate recognizing different wildlife values...Members looked at the strength of data supporting the benefit of a buffer to the population of the pack and to individual habituated wolves...The board elected to defer the amended proposal in order to allow more time for public discussion and for a committee to review and make recommendations...”*
 - c. Board of Game Meeting November 2000 – Proposal 38 – The board established a closed area on a small area of land west of the Savage River in the Stampede Townships. The Summary document from this meeting stated, *“The board listened to emotional testimony from individuals on both sides of the issue. The action is an effort to meet the desires of the wildlife viewers while recognizing the long-standing use of wolves by local residents. The board will revisit this matter in two years to see if the boundary adjustments or other changes are necessary.”*
 - d. Board of Game Meeting October 2002 – Proposal 53, request for a “no kill” area west of the Savage River, by the Alaska Department of Fish and Game, passed by the Board of Game. Summary document from this meeting stated, *“Board members heard considerable public testimony concerning the existence of the current wolf buffer zone, its effectiveness in enhancing viewing opportunities within Denali National Park, and an implied linkage with wolf control in other locations in the state. Agency staff presented data on wolf pack distribution, wolf mortality patterns, and human use patterns in this portion of Unit 20C. Board members recognized the importance of the Toklat wolf pack for non-consumptive uses and noted the comparatively low level of trapping effort in the years preceding 2001 in this 72 square mile area. The board stated that continuation of the closure would allow further opportunity to gather information regarding the effectiveness of this type of closure.”*
 - e. Board of Game Meeting October 2002 – Proposal 55, by Alaska Wildlife Alliance, requested a closed area in Unit 20A east of the park, where one of the Denali wolf family groups spent considerable time. Board of Game amended this proposal and then passed it. Summary documents stated, *“Board members heard considerable public testimony concerning the establishment of a wolf buffer zone east of Denali National Park. Agency staff presented data on wolf pack distribution, wolf mortality patterns, and human use patterns east of the*

park boundary. The board determined that the Margaret wolf pack is subject to consumptive uses upon ranging beyond park boundaries, and that providing a buffer will secure the viewing opportunities of this pack within the park boundaries. The board heard that based on the proposed boundaries trappers could be displaced and forced to encroach existing traplines. Board members discussed the need to determine the smallest area that meaningfully secures the core range of the Margaret wolf pack, while minimizing impacts on other uses of wolves in Unit 20A. The board noted that it was not practical to close all areas used in extra-territorial forays of individual animals from any given pack. The board recognized the importance of having a boundary that is easily identifiable on ground and determined the Anchorage–Fairbanks Intertie powerline to be a distinct boundary.”

- f. Board of Game Meeting February 2004 – Proposal 156 – this proposal, reflecting opinions from several Advisory Committees, sought to remove all the existing Denali buffer zones. Instead. However, the Board of Game retained the Stampede Townships buffer, west of the Savage River, and amended the Nenana Canyon buffer. In addition, the board placed a moratorium on all new considerations of wolf buffers around the park until 2010. In the Summary document, it was stated, *“Scientific results suggested that the Stampede Closed Area and Nenana Canyon Closed Area would have no measurable effect on the biological parameters of the Denali wolf population. However, removal of any wolves is objectionable to those who place a high value on the potential to view event a single animal. The board received considerable testimony in support of maintaining trapping closures near Denali National Park and noted its willingness to make allowances where possible. Trapping opportunities negated by these closures was considered to be negligible. Board members stated their willingness to protect the viewing of wolves along a relatively small area the wolves routinely visit and are viewed, while not trying to protect across their range....In setting a six-year moratorium on changes to the existing closure boundaries, the board intends to evaluate its affect on trappers and the tourism industry.”*
- g. Board of Game Meeting February 2010 – Several proposals were submitted by conservation organizations including DCC, the Anchorage AC, and by NPS to expand the buffer zone. The board spoke about Proposal 65 (by NPS) and then failed to consider all the others (55,56,57,58,59, 60 and 61). The board determined that it would not approve any expansions. On Proposal 63, a move to remove the existing buffers, there was active discussion. In reference to the existing Stampede Closed Area and Nenana Canyon Closed Area, member Spraker refused to eliminate the existing closed areas (referring to the fact that hunters/trappers appear to have adjusted to the existing two closed areas). Member Ben Grussendorf advocated retaining existing closed areas, stated that people had adjusted and it seemed to have worked and consumptive users had found alternative areas, saying *“I hope we as a board recognize that there are other users of this.”* The vote was very close, 4-3, with Hoffman, Spraker and Grussendorf voting to retain existing closed areas, too few votes to retain them.

6. Consider replicating your past closures in this area.

The previously Board-approved Nenana Canyon and Stampede Closed Areas, enacted in their final form in 2004 and successfully in place for **6 years** until 2010, are a solid and workable example of the Alaska Board of Game's acting to recognize the importance of Denali wolves for science and tourism. As shown above, thoughtful board members supported these. Proposal 186 has slightly different boundaries, but its central justification and purpose are the same. We hope that the Board of Game, this year, will carefully consider its history of protecting the wolves of Denali and will support Proposal 186. Or, as a way to continue examining the potential for closed areas to protect viewing and scientific inquiry, reinstitute the 2004 closures, closures that were accepted and settled over many years.

We offer brief comment on a few other proposals from the Denali region scheduled for the Region III meeting:

Proposals 183-184 – Would not support without more data

These would lengthen brown bear season by two weeks, until June 15th. Both proposals assert that there are increasing numbers of brown bears in 20A. Has ADFG censused bears in these areas recently? If brown bears tend to visit bait stations in early June, as mentioned in the proposals, allowing them to be hunted then is tantamount to allowing brown bear baiting. This creates some confusion and could lead to overharvest.

Proposal 185 – Do not support

Further lengthening of the brown bear season in two units until June 30th. There are not enough data to support this increase.

Proposal 60-62 – Do not support with current data

These proposals call for Wolf Control under Intensive Management Plans for a portion or all of Unit 19C. We do not see data showing a reasonably calculated population estimate or harvest objective for moose/caribou in this very remote and rough area that has experienced two harsh winters in a row, making it likely that numbers of ungulates are lower than in previous years. We generally oppose aerial wolf control unless an emergency of some kind exists. We doubt if it would be effective in this rugged country and is unsustainable over many years, while being quite expensive. We are cognizant of how difficult the past couple of winters have been on ungulate populations. It needs to be kept in mind, in the language of proposals, that sheep were never intended to be an intensively managed population, and declines in sheep numbers have multi-factorial causes.

Sincerely,

Denali Citizens Council Board of Directors

Nancy Bale, Steve Carwile, Nan Eagleson, Charlie Loeb, Scott Richardson, Nancy Russell