

ACR 7 - Prohibit the take of wolves on lands in GMU 20 adjacent to Denali National Park.

SUBMITTED BY: Alaska Wildlife Alliance and Denali Citizens Council

MEETING ACR SUBMITTED FOR: Board of Game Statewide Regulations Meeting in March 2016

CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD.

5 AAC 92.510. Areas closed to hunting.

5 AAC 92.550. Areas closed to trapping.

WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. The problem is low numbers and densities of wolves in GMU 20C, which includes Denali National Park and state lands north of the park. The park's spring 2015 survey counted just 48 wolves in the park (a record low number), and since then two additional wolves, including a pregnant female, were killed in May outside of the park, at least one of whom had spent some time at a bear baiting station. Although not the only reason for these declines, hunter/trapper harvest of wolves that den in Denali National Park is significant for individual packs and decreases the opportunity for tourists to view, photograph and enjoy them in a non-consumptive manner.

A small, defined area of state land (a/k/a the Wolf Townships) was set aside as a no-take buffer in 2002, to conserve wolves that den in the park when they follow migrating prey. This area was allowed to sunset by the Board of Game in 2010, and at that time the Board imposed a six-year moratorium on new buffer proposals. **The March 2016 statewide meeting coincides with the expiration of the moratorium, and will provide the only opportunity in 2016 to discuss this issue. Therefore we ask that this proposal be considered at the statewide meeting.**

WHAT SOLUTION DO YOU PREFER? The Board of Game should approve an area closed to the take of wolves adjacent to Denali National Park.

DRAFT REGULATORY LANGUAGE:

Take of wolves is prohibited on lands (GMU 20), in the area bounded on the west by the east boundary of Denali National Park; extending east to one mile east of, and parallel to, the Anchorage-Fairbanks Intertie Electrical Power Line; on the south by Carlo Creek; and on the north by a line from the southeast corner of Township 11S, Range 9W (Latitude 63 degrees, 55 minutes North), due east to the George Parks Highway, then south along the Parks Highway to a line running due east from the Highway through the town of Healy, to one mile east of the Intertie Line; inclusive of all lands west of the George Parks Highway commonly referred to as the "Wolf Townships," and/or "Stampede Trail".

See the 2016 Denali Wolf Buffer Proposal Boundary map accompanying the Proposal submitted herewith.

STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED ABOVE.

- a) **for a conservation purpose or reason:** The wolves that den and spend much of their time in Denali National Park are a scientifically, socially, culturally and economically valuable wildlife resource highly valued by both Alaskans and visitors seeking the unique experience of seeing a wolf in the wild. Without the requested closed area, the park's wolf population will likely remain at unprecedented low numbers and densities, and ongoing harvest by hunters and trappers will become proportionally more significant in this decline.
- b) **to correct an error in regulation:** Not applicable.
- c) **to correct an effect on a hunt that was unforeseen when a regulation was adopted:** The take of two wolves from the East Fork pack on state lands north of Denali National Park in May 2015, described above, was likely the result of more hunters being in the field to hunt brown bears at bait stations from April 15-June 30, under regulations adopted for this area (GMU 20C) by the Board of Game in 2012. The effect of these bear hunting regulations on wolf take (legal until May 31 under existing regulations) was unforeseen when the bear hunting regulations were adopted. This unexpected effect led to an Emergency Closure of wolf take on some state lands in GMU 20C adjacent to the national park on May 15, 2015.

In 2014, the Board of Game increased the wolf hunting bag limit in GMU 20C from 5 to 10 wolves. With additional hunters in the field, this more liberal bag limit will likely result in a higher number of wolves harvested. The Board of Game should consider the additional, unforeseen pressure on an already low wolf population in GMU 20C caused by the presence of bear hunters in May and June, and by more liberal wolf bag limits on state lands close to the national park.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE? The park's wolf population has declined steadily during the past nine years, and since 2010 the opportunity to view a wolf inside the park has declined dramatically. Significantly, between the spring and fall 2014 surveys an expected rebound in the numbers due to pup production did not occur. Without a solution to this problem, more wolves that venture outside Denali Park will be taken in the 2015-16 hunting/trapping season, placing an already regionally depleted population under additional stress, with associated loss of viewing opportunities.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE. The aforementioned decline, documented in the accompanying proposal, represents a serious and continuing decline in the population of a valuable wildlife resource, and therefore is a current and critical conservation issue. Though this decline is not considered by many to be a population-level biological concern, we argue that sub-unit and regional population concerns should be eligible for consideration.

IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE. Many consider the issue of wolf-take adjacent to Denali National Park to be predominantly allocative. Although we believe there is a critical conservation concern with respect to these particular wolves, we also agree that allocation between consumptive and non-consumptive uses is an important element of this issue.

What is new and compelling is the following: In 2015, the Board of Game made the decision to defer the Interior Region (Region III) meeting from 2016 to 2017, as part of its decision to move to a three year cycle of meetings. The organizations and individuals who intended to bring a Proposal regarding wolf- take in the Denali region had expected to be able to do so in 2016, especially because the Board had placed a six year moratorium on such proposals in 2010. We consider it an obligation for the Board of Game to provide that opportunity in 2016.

STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR. The Alaska Wildlife Alliance is a nonprofit organization speaking for non-consumptive users of this wildlife resource. Denali Citizens Council is a locally-based, nonprofit, public interest organization whose members have a direct interest in conservation of Denali wolves.

STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF GAME MEETING. Most recently, an Emergency Petition requesting closure of this area was introduced but not considered at the Board of Game's March 2015 meeting. Since the 2010 Region III Board of Game meeting, there has been a moratorium on proposals for areas closed to the take of wolves on lands adjacent to Denali National Park. This moratorium will expire in 2016.

(See attached maps and proposal.)

2015 Denali wolf population map

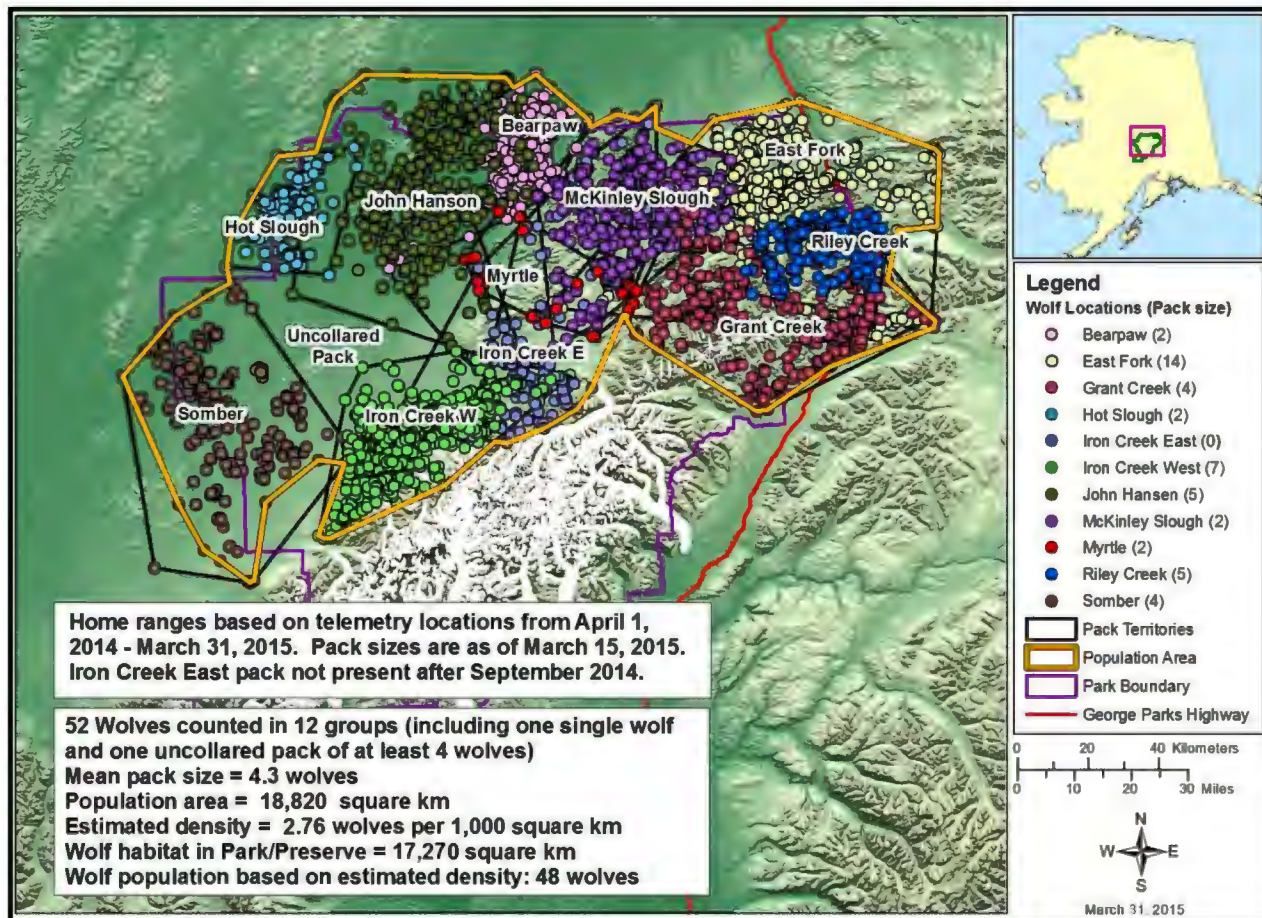
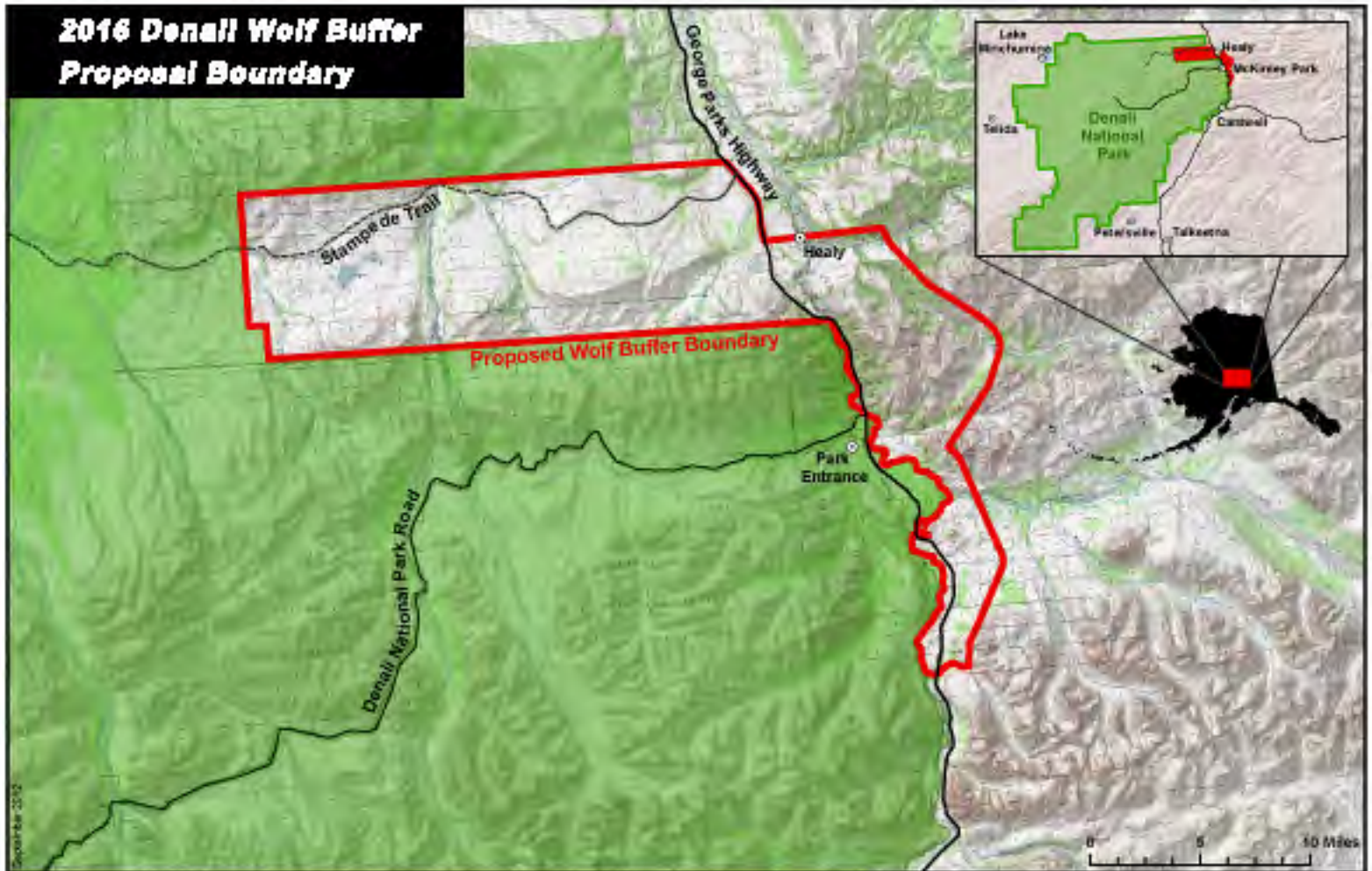


Figure 1. Wolf pack territories in Denali National Park and Preserve, March 2014.

**2016 Denali Wolf Buffer
Proposal Boundary**



PROPOSAL:

Prohibit the take of wolves on lands in GMU 20 adjacent to Denali National Park

[What is the issue you would like the board to address and why?]

Summary:

The wolf population in Denali National Park has been in a steady decline for nine years, from a high of 116 in spring 2006 to a new record low of 48 wolves counted in the park's spring 2015 survey. The total of 48 wolves counted by National Park Service (NPS) biologists in March 2015 (down to 46 in early May) represents an unprecedented low in the nearly 30 years that the semi-annual population counts have been conducted.

Such declines are associated with significantly diminished wolf viewing opportunities for visitors over the years. For 2014, the likelihood that a visitor would see wolves along the park road was 6 percent, down from 45 percent in 2010. In spring of 2015, three wolves were taken on state lands by hunter/trapper activity, all three from the East Fork Pack, and one of them a pregnant female. Unfortunately, these are also the wolves that are most easily viewed by the park's half-million annual visitors. This take led Alaska Department of Fish & Game Commissioner Sam Cotten to institute an early closure to wolf hunting in this area.

Human take of wolves in areas close to Denali National Park is a contributing factor to population declines. However, going forward, it will continue to be significant to individual packs that are enjoyed in a non-consumptive manner by hundreds of thousands of tourists and Alaskans every year. The most workable solution to this problem is to establish a "no wolf-take area" on certain key lands adjacent to the park. This proposal asks that the Board of Game establish such an area, and a more detailed explanation is presented below.

Discussion:

1. The Alaska Board of Game has acted in the past to create no-wolf take areas in GMUs 20A and 20C adjacent to Denali National Park and Preserve.

Acknowledging that the park wolves were a valuable resource for visitors, in 2001 and 2002 the Board of Game approved no-take closed areas (Stampede and Nenana Canyon) adjacent to the park. This was at a time when the wolf population was higher (2002 spring count of 97 wolves, or 5.6/1000 km²). When this existing buffer was scheduled to sunset in 2010, the Board of Game decided, in a very close vote, not to restore the buffer, despite evidence from the National Park Service that declines were continuing, human harvest as a factor in Denali wolf deaths was increasing, and more state lands would need to be closed to wolf take in order to adequately address the issue.

Although the Board of Game has used its authority to close human take of wolves adjacent to Denali National Park, it has been uncharacteristically non-responsive to data showing continued declines in both numbers of wolves and viewing success by visitors. In 2010, the Board of Game placed a moratorium on consideration of this issue until 2016. Then, in

2012, the Board of Game allowed the hunting of brown bears over bait in GMU 20C, bringing more hunters into the field, and in 2014, doubled the hunting bag limit of wolves in GMUs 20A and 20C from 5 to 10 and retained long harvest seasons, from August 10 - May 31. We believe that it is now time for the Board of Game to reconsider the type of allocation pressure it has placed on lands adjacent to the park, and to return, instead, to the institution of “no-take” areas.

We ask that the Board of Game again recognize the importance of this particular region of the state for viewing, photographing and enjoying wolves in a non-consumptive manner.

2. Viewing and non-consumptive use of wolves are important values, already recognized by the Alaska Department of Fish & Game.

From the *Wolf management report of survey-inventory activities, 1 July 2008 – 30 June 2011* (Alaska Department of Fish & Game, Division of Wildlife Conservation) [p. 160]:

MANAGEMENT GOALS

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. We recognize the aesthetic value of observing wolves in their natural environment as an important human use of wolves.

The premier location to *view, photograph and listen* for the howls of wolves in their natural environment in Alaska is Denali National Park

In 2010, the NPS initiated a “wolf sighting index,” designed to measure the likelihood that visitors on park buses would see a wolf. In 2010, 45 percent of visitors were likely to see a wolf. In 2011, a year after the buffer was eliminated, the number fell to 21 percent, then to 12 percent in 2012, the same year that the Grant Creek pack, which frequented areas near the road on the eastern side of the park, dispersed after the breeding female was trapped just outside of the park boundary, within the former buffer zone. The pack declined from 15 members to only three that year. In 2013 just 4 percent of visitors were likely to see a wolf, and in 2014 the number was 6 percent, a statistically insignificant increase.

Unquestionably the park’s iconic wolves are high on visitors’ lists of animals they have come to see. Those visitors spend money that has an enormous impact on the local Denali economy. A NPS report shows that the more than 530,000 visitors who came to the park in 2014 spent \$5.24 million in nearby communities. That spending supported almost 7,000 jobs in the local area – including 300-plus employees of the park’s largest concessionaire - and had a cumulative benefit to the local economy of \$7.48 million.

The Management Goals statement quoted above cannot be interpreted as dictating that hunting or trapping should be more important “human uses” of wolves than photography, viewing or listening to wolves, especially in Alaska’s number one wildlife tourism destination – Denali National Park. - Additionally, one of the world’s premier scientific wolf study programs has been ongoing in this region for more than 20 years.

3. Wolves which den inside Denali National Park are particularly vulnerable to hunting and trapping in late winter and spring when they take hunting forays onto lands north and east of the park.

Hunting forays onto lands north and east of Denali National Park have been noted and recognized by wildlife scientists since the 1980s. Radiolocations have shown over many years that wolves which den within the park tend to follow caribou into the Wolf Townships in spring. This makes them specifically and predictably vulnerable to hunting and trapping, especially with liberal hunting and trapping seasons and bag limits in those areas. The most recent radiolocation map is available in the Spring 2015 monitoring report, Arthur, S., *Wolf Monitoring in Denali National Park and Preserve, 2014-2015*. The 2015 Denali wolf population map accompanies this proposal.

4. Wolf densities in Denali National Park and in GMU 20C are well below the ADF&G management goal of ≥ 11 wolves/1000 mi²

The ADF&G Wolf management report (cited above) states a “management objective” for wolf population densities in GMUs 20A and 20C (including the park and the Wolf Townships/Stampede Trail area). The objective is at least 11 wolves /1000 mi² (4.3 wolves per 1000 km²). Within the park (included in GMU 20C) the NPS’s spring 2015 population survey tallied just 7.3 wolves/1000 mi² (2.8 wolves/1000 km²). The most recent census on state-only lands in northeastern GMU 20C (2012) yielded a low density of 10.7 wolves/1000 mi² or 4.1 wolves/1000 km², indicating a subunit-wide concern. No other state-conducted censuses of 20C lands outside the national park have been documented since then.

That density of 7.3 wolves/1000 mi² within the park is well below ADF&G’s own target density for wolves in the GMUs 20A and 20C. A no-take buffer adjacent to the park boundary on land frequented by the park wolves – as requested by this proposal - is a valid management tool to address this objective.

5. Human take of wolves, though not the only contributor to declines in wolf numbers and viewing success, is likely to be more significant when total numbers are lower and when breeders are taken – and human take can be controlled by the Board of Game.

In April 2015, Bruce Dale, acting director of the Division of Wildlife Conservation, provided an estimate that 16-18 wolves were taken in the former buffer (Stampede and Nenana Canyon closed areas) between 2010 (when the areas were eliminated) and 2013. Assuming the estimate covers three hunting/trapping seasons, an average of about six wolves were taken each year in the former buffer zone. Six wolves per year is a very substantial number when taken from the small sub-set of the wolf population that is most often visible to visitors along the park road – the same wolves that would cross the park boundary on hunting forays onto adjacent lands.

In addition, current hunting/trapping regulations allow take of wolves well into the breeding season (seasons end April 30 for trapping and May 31 for hunting), meaning that pregnant females can be taken very close to the time of whelping. A recent NPS study (Borg, B.L, Brainerd, S.M., Meier, T.J. & Prugh, L.R. (2015) *Impacts of breeder loss on social structure, reproduction and population growth in a social canid*. Journal of Animal Ecology, 84, 177–187) showed that the death of a breeder can affect the integrity of the entire pack, making the killing of one wolf significant beyond mere numbers. Looking just at the total number killed does not give an accurate picture of the effect on the wolf population as a whole.

[What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)]

We are asking the Board of Game to establish a no-wolf take zone in a small portion of GMU 20, subunits 20A and 20C, adjacent to Denali National Park. In general, the proposed buffer boundary includes the Wolf Townships/Stampede Trail area, and land on the east side of the George Parks Highway from Healy to a point about 11 miles south of the Denali National Park entrance.

DRAFT REGULATORY LANGUAGE:

Take of wolves is prohibited on lands (GMU 20), in the area bounded on the west by the east boundary of Denali National Park; extending east to one mile east of, and parallel to, the Anchorage-Fairbanks Intertie Electrical Power Line; on the south by Carlo Creek; and on the north by a line from the southeast corner of Township 11S, Range 9W (Latitude 63 degrees, 55 minutes North), due east to the George Parks Highway, then south along the Parks Highway to a line running due east from the Highway through the town of Healy, to one mile east of the Intertie Line; inclusive of all lands west of the George Parks Highway commonly referred to as the “Wolf Townships,” and/or “Stampede Trail”.

Please see the *2016 Denali Wolf Buffer Proposal Boundary map* accompanying this proposal.

The proposed boundaries for the closed area coincide approximately with the Denali National Park wolf population area, delineated by telemetry locations. Please see the *2015 Denali wolf population map* accompanying this proposal. It is clear from park telemetry data that the range of several park packs extends into the limited area of land adjacent to the park boundary that is proposed for closure.

[What will happen if nothing is done?]

Liberal hunting seasons (August 10-May 31) and bag limits (10 wolves) will continue on GMUs 20A and 20C, adjacent to the north and east boundary of the park.

Human take of park wolves on lands adjacent to the park will continue. The wolf population

within the park and adjacent lands will be at risk for continued declines in numbers and viewability.

[Who is likely to benefit?]

More than half a million park visitors each year will benefit if the proposed buffer is approved. Vacationers and Alaska residents travel into the park and Stampede area with the goal of seeing wildlife, including wolves.

The local and state tourism economies will benefit when visitors have an improved chance of seeing wolves, without the negative publicity of park wolves hunted or killed in snares.

[Who is likely to be inconvenienced?]

This proposed buffer would inconvenience at most a few recreational hunters/trappers. Trappers would have to set their traps farther away from the park boundary. Likewise, hunters would be prohibited from taking wolves on land closest to the park.

Literature cited

1. Harper, P., ed., *Wolf management report of survey-inventory activities, 1 July 2008-30 June 2011*, Species Management Report ADF&G/DWC/SMR-2012-4
2. Arthur, S., *Wolf Monitoring In Denali National Park and Preserve, 2014 – 2015*. <http://www.nps.gov/dena/learn/nature/upload/2015-Current-Resources-Projects.pdf>
3. Borg, B.L, Brainerd, S.M., Meier, T.J. & Prugh, L.R. (2015) *Impacts of breeder loss on social structure, reproduction and population growth in a social canid*. *Journal of Animal Ecology*, 84, 177–187. <http://onlinelibrary.wiley.com/doi/10.1111/1365-2656.12256/abstract>

Attachments

2015 Denali Wolf Population map

2016 Denali Wolf Buffer Proposal Boundary map

[Submitted by]

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