

**ACR 18** - Prohibit the take of wolves on lands in GMU 20 adjacent to Denali National Park

**SUBMITTED BY:** Alaska Wildlife Alliance and Denali Citizens Council

**ACR SUBMITTED FOR:** Board of Game 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 that den in Denali National Park and venture onto state lands north of the park. The park's spring 2015 survey counted just 48 wolves in the park (a record low number), and the fall 2015 survey showed 57 wolves, only a 7% gain overall. However, the five wolf families that occupy the northeastern portion of Denali National Park experienced no population gain at all. These five groups, East Fork, McKinley Slough, Myrtle Creek, Riley Creek and Grant Creek, totaled 27 wolves in both spring and fall 2015. It is wolves in these packs that are most vulnerable to hunting/trapping pressure on lands adjacent to the northeast corner of the national park.

Although not the only reason for these low numbers, hunter/trapper harvest of wolves that den in Denali National Park is significant for individual packs. The well-known East Fork Pack experienced the greatest losses between spring and fall 2015. Three wolves that are known to have died as a consequence of hunting/trapping activities on state lands adjacent to the park in 2015 were from the East Fork Pack. One of them was a pregnant female, compounding the loss. Currently there is no regulation in place to protect pregnant females from hunter/trapper harvest.

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. Again those packs that occupy the eastern portions of Denali National Park are most at risk when they conduct predictable forays onto state lands in the Wolf Townships and along the Nenana River. Regulations closing these lands to wolf take were 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 will provide the first opportunity since then to discuss this issue.** Without discussion and action at this meeting, conditions contributing to the decline of wolves in the eastern portions of the park will continue for at least two hunting/trapping seasons.

**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:** New survey information on wolves that den inside Denali National Park became available this fall (<http://www.nps.gov/dena/learn/nature/wolves.htm>), pointing to continued low numbers and densities of wolves inside Denali National Park, and to the continued vulnerability of wolves who den in eastern parts of the park.

There are two elements that make wolf conservation in this area an important issue for the Board of Game in 2016 -

*i. the particular risk for wolves who den in the national park.* This risk is influenced by a combination of factors - historically predictable forays onto state lands adjacent to the park, the potential for hunting to disproportionately affect packs denning in eastern areas of Denali, the vulnerability of breeding females during hunting season (their loss will disrupt wolf packs beyond mere numbers), and documented low numbers of wolves (below ADF&G goals of 11 wolves/mi<sup>2</sup>) - all of these factors make it advisable to consider ways to limit take of wolves. Even a documented yearly take of 4-6 wolves would be significantly detrimental to Denali’s eastern packs.

*ii. the particular value that conservation of these wolves has for Alaska citizens, the tourism economy, and for science.* Large numbers of Alaskans value the conservation of the Denali-area wolves (reflected in hundreds of pages of public comment over several years). The opportunity to see a wolf brings tourists from around the world to the Denali region. Beginning with the work of L. David Mech in the 1980s, state and federal biologists have collaborated in continuous study of the Denali wolf packs, making notable contributions to scientific interpretation and understanding of wolf ecology.

The particular risk to wolves that den in the park and travel onto state lands in 20A and 20C will continue for at least two more hunting/trapping seasons, unless this ACR is granted and the Board of Game can consider this issue in 2016. Again, the Board of Game has accepted ACRs where there was no overall population concern, but where there was a significant public or department-level concern. Conservation of these wolves meets that criterion.

**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 by the Director of the Division of Wildlife Conservation on May 15, 2015.*

The Department of Fish and Game identified this as a problem in its *Emergency Closure* and committed to consideration of this new information (see text of *Emergency Closure*, attached to this ACR). However, the results of this consideration have not been documented or disseminated to the public. As a result, additional bear hunters in the field during wolf hunting season will be a factor for at least two more hunting seasons, unless the Board of Game considers this issue in March 2016.

**WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE?** Without a solution to this problem, more wolves that venture outside Denali Park will be taken in the 2016 and 2017 hunting/trapping seasons, placing an already regionally depleted population under additional stress. The Department's obligation to consider and report on its conclusions regarding the *May 15, 2015 Emergency Closure* will go unfulfilled.

**STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE.** Though low numbers of wolves adjacent to Denali National Park are not considered by many to constitute a population-level biological concern, there is nothing in Department written policy or in the existing record of ACR acceptance to indicate that sub-unit and regional conservation concerns are ineligible for consideration. As stated above, the *high importance/high risk status* of wolves that den in Denali National Park and venture onto state lands provides ample justification for consideration as a conservation concern.

**IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.** Although there is a critical conservation concern, detailed above, allocation between consumptive and non-consumptive uses is also an important element of this issue. Almost always, however, allocation follows a conservation need, as it does in this case. Alaskans respect the Board of Game's role in making allocation decisions. In fact, the organizations and individuals represented here had intended to bring a Proposal for *no wolf take* areas in the Denali region at the scheduled Region III meeting in 2016. We were led to believe this opportunity would occur, until recent changes in the cycle of meetings deferred the Region III meeting to 2017. The moratorium on Proposals for *no wolf take* areas that began in 2010 should be allowed to end in 2016, as originally foreseen by the Board of Game. Discussion has been deferred for long enough. The Department and Board have been unable to cite, specifically, any other wildlife management issue of concern to so many Alaskans that has been deferred for this long.

**STATE YOUR INVOLVEMENT IN THE ISSUE THAT IS THE SUBJECT OF THIS ACR.** The Alaska Wildlife Alliance is a nonprofit organization speaking for nonconsumptive users of this wildlife resource. Denali Citizens Council is a locally-based, nonprofit, public interest organization (unaffiliated with the National Park Service), 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 ACR to place a Proposal for a Denali *no wolf take* area on the March 2016 Board of Game meeting agenda was considered and declined by the Board at its

August 7, 2015 teleconferenced meeting. This ACR brings new information to the Board of Game.

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 introduction of Proposals for areas closed to the take of wolves on lands adjacent to Denali National Park. The previously-scheduled Region III meeting in March 2016 was to be the first opportunity since 2010 for the Board of Game to consider a Denali wolf proposal. This Region III meeting was deferred to 2017 last year.

Attached:

*Copy of Press Release for ADF&G Emergency Closure of May 15, 2015*

*NPS Map of wolf pack territories 2015*

*NPS Wolf Survey Data 1986-2015*

*Boundary Map of proposed area closed to the take of wolves*

*Full Proposal for Board of Game March 2016 meeting*

# **NEWS RELEASE** *Thursday, May 14, 2015*

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## **ADF&G Closes Wolf Hunting along Stampede Trail**

An emergency order issued today by the Department of Fish and Game closes wolf hunting in part of Unit 20C along the Stampede Trail west of the Savage River near Denali National Park and Preserve effective at midnight Friday, May 15, 2015.

The hunting season for wolves was scheduled to run through the end of May in this area. Wolf trapping season has already closed for the year.

The Board of Game prohibited hunting and trapping of wolves from 2001 until 2010 in an area known as the “wolf buffer” which includes the Stampede Trail. The controversy regarding the “wolf buffer” is centered around allocation of wolves between harvest by hunters and trappers and wildlife viewing opportunities for Park visitors. Allocation issues are the purview of the Board of Game.

Two wolves were harvested in the area during the first week of May by hunters. In previous years, no wolves were harvested by hunters in May along the Stampede Trail.

“Current levels of wolf harvest do not cause a biological or conservation problem for wolves in Unit 20C, which includes a large portion of Denali National Park and Preserve,” stated Division of Wildlife Conservation Acting Director Bruce Dale.

Recent changes in bear hunting regulations have resulted in more hunters being in the field in May. Hunters commonly seek other legal species during bear hunts.

“This situation increases the chances of wolves commonly seen in the park to be taken as they venture on to adjacent lands,” Fish and Game Commissioner Sam Cotten stated. “This temporary closure will prevent additional take of wolves this May so the Department and the Board can consider the new information.”

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