



July 10, 2015

The Alaska Wildlife Alliance and Denali Citizens Council have submitted an Agenda Change Request (ACR) to the Alaska Board of Game to close an area adjacent to Denali National Park to the taking of wolves under both hunting and trapping regulations. Under the board's ACR policy, the board will only accept an ACR:

- A) For a conservation purpose or reason
- B) To correct an error in regulation or
- C) To correct an effect on a hunt that was unforeseen when a regulation was adopted

The board will not accept an ACR that is predominately allocative in nature in the absence of new information that is found by the board to be compelling. [5AAC 92.005 a (2-3)]

With respect to the ACR policy acceptance criteria:

- A) The department does not have a conservation concern.
- B) The department is unaware of any error in regulation.
- C) The department is unaware of any unforeseen effects that are the result of regulations concerning wolf hunting, trapping and harvest; however there may be unforeseen effects of regulations regarding hunting brown bears at bait stations in the area.

This ACR is allocative in nature. The board needs to decide whether the effects of the bear baiting regulations constitute new information to consider regarding the allocation of wolves relative to viewing and harvest.

The current low population of wolves may be unprecedented for Denali National Park, but it is not unprecedented in the Interior Alaska ecosystem. The low wolf population is commensurate with the low population of ungulates in the park on which wolves depend for food. This does not constitute a threat to the wolf population, and is well aligned with the NPS management philosophy of allowing natural processes to occur. In Unit 20A immediately adjacent to the east side of the park, the moose population is high, resulting in a wolf population density approximately four times higher than in the park.

In general, wolf populations in Alaska are regulated by prey abundance and availability, natural mortality, and emigration. There is consensus among ADF&G and DNP biologists that the take of wolves that spend much of their lives inside the park by hunters and trappers outside the park is not

sufficiently large to regulate the Denali Park wolf population. Thus, neither approval nor denial of the requested closure is likely to appreciably affect the Denali Park wolf population.

The ADF&G management goal for wolves in the Fairbanks area (Units 20A, 20B, 20C, 20F, and 25C) is a fall density (after pup production) of 4.2 wolves/1000 km<sup>2</sup> (11 wolves/1000 mi<sup>2</sup>). The estimated density of wolves in DNP during spring 2014 (before pup production) was 2.76 wolves/1000 km<sup>2</sup> and the estimated spring density in a 12,059 km<sup>2</sup> portion of Unit 20C north of DNP was  $\geq 4.1$  wolves/1000 km<sup>2</sup> during spring 2012. Thus, it is likely with spring pup production across Unit 20C that the management objective for the fall population density will be met during 2015.

The supposition by the petitioners that the wolf situation in Denali National Park was unforeseen is not supported. At the 2010 Board of Game meeting, Board Chair Spraker clearly stated on the record that take of wolves within the buffer that was in place at that time (but which was rescinded at that meeting) would likely lead to occasional trapper/hunter take of wolves that used the east end of Denali National Park. Therefore, take of wolves that use the park was neither unforeseen nor unexpected, but was actually predicted.

However, the board has recognized trade-offs among viewing and consumptive uses in this area in the past. Those concerns led to the previously approved "buffer" area closed to the taking of wolves. The board may want to consider whether the changes in bear hunting regulations will affect wolf harvest patterns and the allocation between viewing and hunting and trapping opportunities. The new bear hunting regulations may increase the probability of take of wolves right before the summer visitor viewing season. This timing of take may preclude wolves re-colonizing those areas in time for the summer visitor season and affect the allocation between viewing and hunting and trapping.

ADF&G has no conservation concerns regarding wolves in Unit 20C, including the area closed by Emergency Order (EO) in May 2015. This area was closed in order to allow the Board of Game time to revisit the issue of wolf hunting seasons and bag limits without additional take of wolves adding to the controversy. We believe the controversy regarding the so-called "wolf buffer" centers around the allocation of wolves between harvest through trapping and hunting and wildlife viewing opportunities for Park visitors. Allocation issues are the purview of the Board of Game.

Data indicate that the increase in the bag limit from 5 to 10 wolves by hunting did not result in a higher number of wolves harvested, and is not likely to do so in the future. In Unit 20C, an average of 4 wolves per year were taken by hunting during regulatory years (RY) 2009 - 2013 when the bag limit was 5 wolves per year and 4 wolves were taken by hunting in RY 2014 with the higher bag limit of 10 wolves per year. Although the RY 2014 hunting season closed 15 days early, no hunters in Unit 20C bagged more than 1 wolf, as is typical throughout areas of the state with a high hunting bag limit. The majority of wolves harvested in Unit 20C are taken by trapping, with few taken by hunters.

The department does not have conservation concerns regarding this wolf population, nor are there unforeseen population effects of regulations allowing wolf harvest in this area. The board may wish to

consider whether the effects of the bear baiting regulations constitute new information regarding the allocation of wolves relative to viewing and harvest.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Dale", written over a light grey rectangular background.

Bruce Dale  
Director  
Division of Wildlife Conservation