



January 21, 2016

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 (DNP) to the taking of wolves under both hunting and trapping regulations.

With respect to the board's ACR 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 compelling new information regarding the allocation of wolves relative to viewing and harvest.

Preliminary 2015 survey information reported by DNP pointing to continued low numbers and densities of wolves inside the park is not a conservation concern. 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 of 4.2 wolves/1000 km² (11 wolves/1000 mi²). We acknowledge that wolf density varies within this area. The estimated density of wolves in DNP during fall 2015 was 3.29 wolves/1000 km². Lower fall densities were reported in 1986 (2.69 wolves/1000 km²) and in 2012 (3.11 wolves/1000 km²), but densities recovered the following year to densities above 4.2 wolves/1000 km².

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. In August 2015, the board determined that this issue would not be considered at the March 2016 board meeting.

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. 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 compelling new information regarding the allocation of wolves relative to viewing and harvest.

Sincerely,



Bruce Dale, Director
Division of Wildlife Conservation