March 10, 2015



Alaska Board of Game PO Box 115526

Juneau, Alaska 99811 by FAX: (907) 465-6094

Dear Alaska Board of Game members,

On behalf of the board and members of the Denali Citizens Council, I offer comments in support of the Petition requesting the Board of Game to Adopt an Emergency Regulation closing state lands to take of wolves – Along the Eastern Boundary of Denali National Park.

The Denali Citizens Council (DCC) is a grassroots community interest organization headquartered near McKinley Village. Founded in 1974, we support careful planning for a sustainable future on state and federal lands in the Denali area. We are not an anti-hunting or anti-trapping organization, nor are we a national park partner organization. Our members value the rural lifestyles and wild lands in the Denali area, and work to retain the special character of this area through education and civic involvement. For years we have communicated and collaborated with Alaska state government agencies when proposals and planning initiatives have come forward.

The Denali Citizens Council has not been a signer of any petition on wolf hunting/trapping and has not introduced its own proposal on these activities <u>since 2010</u>. However, this February, our board of directors decided unanimously to sign the above petition, and we support it wholeheartedly. Why did we make this decision? There were three main factors:

1. We're concerned about ongoing low numbers of wolves in the national park and GMU 20C, especially the lack of rebound between spring and fall 2014 numbers inside the park. Surveys by the state of Alaska in GMU 20C have confirmed low wolf numbers across the entire subunit. The petition, however, only requests a closure in a small portion of the unit, adjacent to the national park.

2. The timing is right.

We agree that the situation as described in the petition has become urgent enough to approach you now, instead of next year, 2016, when the moratorium on proposals regarding wolf take ends. In addition, because the cycle of Board of Game meetings has now changed to 3 years, an Interior Region meeting will not occur until 2017, clearly too long to wait for a proposal.

3. Alaskans are concerned.

There is significant local, statewide and national interest and concern.

- a. DCC conducted a member survey in 2014, and 72% of respondents supported closure of wolf townships to hunting and trapping of wolves.
- b. DCC held a forum on wildlife management at the boundaries of the park last August with more than 100 individuals in attendance.

PO Box 78, Denali Park AK 99755

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907-683-3396

Board of Directors

David Arnold

Nancy Bale

Sarah Bartholow

Nan Eagleson

Brian Napier

Michael Raffaeli

Hannah Ragland

Erica Watson

c. DCC opened a petition in support of protecting wolves on state lands outside the national park on March 5, 2015. In less than a week, the petition gathered more than 2000 signatures. The signatures from Alaskans, along with Alaskans' comments, are attached to this letter.

The Board of Game attempts to ensure hunter opportunity under existing laws and statutes and we accept that mandate. However the Board of Game and the Department of Fish and Game have a wider mandate to serve the interests of all Alaskans and to create opportunities for non-consumptive uses and enjoyments of wildlife. You have the support of many Alaskans in making the decision requested in this petition, and we urge you to make it. Below we offer additional reasons in support of the petition.

- 1. There is no doubt that the Board of Game has the authority to perform closures and conservation actions regarding wolves on state lands next to Denali National Park. The Board has done it before, in 2000, 2002 and 2004. In 2010, when discussing whether to eliminate existing buffer areas in the Stampede and Nenana Canyon, member Spraker supported retaining them, stating,... "I am trying to recognize the comments of a diverse group of people throughout the state...," and member Grussendorf, also in support of retaining, stated, "A lot of the public that enjoys going in there are Alaskans...I hope that we as a board recognize that there are other users of this....we have been trying to accommodate all users where we can, and I think it would be a mistake,... social implications and the economic implications..., if we eliminated these areas..." These two Board members recognized the diverse interests of Alaskan citizens, and the authority of the Board of Game to address those interests.
- 2. The Board of Game has discretion as to the exact area to close, and the exact length of the closure.
- 3. When discussing this petition, we encourage you to consider the radio-collaring data provided in the map attached to the petition. It is clear from this data, and past data presented to you by NPS in 2010, that packs which den inside the park move onto state lands outside the park, preferentially in winter. Such a situation makes these wolves specifically vulnerable in trapping and predator-hunting season. This past year, two packs were known to den in the entrance area of the national park, east of the Savage River. The presence of these packs caused a slight uptick in viewability for park wolves toward the end of the 2014 summer season. However, it is but a short walk for these wolves out to state lands, making these two packs particularly vulnerable this year. We additionally hope that if you vote to make a closure, it will be of sufficient length to allow wolf numbers to rebound, or at least to test that hypothesis.
- 4. The actions requested in the petition are <u>not</u> part of a campaign to make the Stampede area into a national park. Many members of the Denali Citizens Council conduct activities in the Stampede townships that are clearly inconsistent with designation of these lands as a National Park. Denali Citizens Council as a whole does not favor the designation of these lands as a National Park. These are state lands. This does not mean, however, that conservation activities cannot be undertaken through the Board of Game process. In fact, it was to the Board of Game that this petition was referred by the Commissioner of the Department of Fish and Game, Sam Cotten.

5. If the Board of Game were to support a closure of this type, doing it next to Denali National Park is the logical and preferred location. The opportunity to view wolves in this park is marketed worldwide and constitutes part of the attraction of this park for travelers, and for many Alaskans, too. As the petition points out, Denali National Park is an important economic engine for the Denali Borough and the state as a whole. This is of particular interest to DCC members.

Although in general the Board of Game might be reluctant to take this kind of action, because it limits hunting/trapping opportunity for some, your reluctance should be balanced by the likelihood of enhanced viewing opportunity for many and potential survival of wolves that den inside the national park, along with the satisfaction of a large group of your Alaskan constituents, who have supported this idea for many years.

We would like to thank the Board of Game for including consideration of this petition during the very busy schedule of its Southcentral Region meeting. We invite you to consider this petition seriously, and to take action to address the problem of continued low numbers of wolves in a very important region of the State of Alaska.

Sincerely,

/s/

Nancy Bale DCC Board of Directors

907-244-2510

Attachment: 119 Alaskan signatures, with a few comments, from petition opened on 3/5/2015 and printed on 3/10/2015. Text of the petition below:

"We the undersigned urge the Alaska Board of Game to prohibit the killing of wolves on state lands at the northeast boundary of Denali National Park. This action would provide needed protection for the wolves who den in the park, when they move into this historically important part of their habitat."

We the undersigned urge the Alaska Board of Game to prohibit the killing of wolves on state lands at the northeast boundary of Denali National Park.

Name	Date	Zip Code	Comments
NANCY HUNT	3/8/15		Comments
Larry Swartz	3/7/15		
melody fitzpatrick	3/5/15		
tara conard	3/7/15		
Marcia Denison	3/7/15		Please, do the right thing. Give the Denali Wolves a safe zone. Thank you.
barbara reilly	3/7/15		
Karen Deatherage	3/7/15	99501	
Katharine Swift	3/6/15	99502	As someone who helps people appreciate all of Denali's wildlife & habitat and as someone who has testified to keep the buffer, I URGE you to take action on this petition.
Margaret Wilkinson	3/7/15	99502	
Nancy Bale	3/5/15	99503	
Jerrianne Lowther	3/6/15	99504	
April Warwick	3/6/15	99504	The BOG removal of the buffer zone resulted in much less wolves in Denali, they need to correct their mistake.
Terry Cummings	3/6/15		
linda donegan	3/7/15		
Martha Siebe	3/8/15		Alaska
Steve Carwile	3/6/15	99508	Admit that wolves in this area are more valuable alive than dead.
Quentin Reuer	3/6/15	99508	
S Kinsey	3/7/15	99508	Haven't we done enough to destroy the wolf population?
Janeen Herr	3/7/15	99508	this has been a long standing battle to get the BOG to understand that these wolves provide more revenue and value to the state alive than trapped, skinned and hanging on some guys cabin wall. As a tour driver in Denali for a decade I can attest to this. Protect them!
Emily Becker	3/10/15	99508	AK
Sharon Lowe	3/6/15	99515	

Paul Joslin	3/5/15	99516	You saw what happened when the wolf buffer was removed. Wolf viewing inside the park dropped precipitously. There are an estimated 1500 wolf packs in Alaska. Sparing a couple of wolf packs from hunting and trapping when they venture outside the park in winter is not asking much, especially when you consider that they provide almost all of the fulfilled viewing opportunities that the vast majority of visitors to Alaska get to experience. Thank you for your understanding in this matter.
Elizabeth Hatton	3/6/15	99516	
Gloria Oswald	3/5/15	99517	
Tim Linebaugh	3/5/15	99567	Save the Wolves
Linda Boggs	3/6/15	99577	It's sad that a system is in place where these animals learn to accept humans in their space in the summer yet that conditioning is fatal as soon as they step out of the park.
Bob Gengler	3/6/15	99577	Please create this buffer zone
Andra Silgailis	3/7/15	99577	As an Alaskan, I feel us residents do not have enough wolves to view.
John Brueck	3/5/15	99587	
Joan Frankevich	3/6/15	99587	I've lived in Alaska for over 30 years. The first (and only!) wolves I've seen have been in Denali. Please help preserve this experience which is not easily found elsewhere in the world. These wolves are so important to Denali Park visitors. Please offer them the protection they
Milli Martin	3/6/15	99603	
Nina Faust	3/7/15		The State needs to start working with the National Park Service to protect these special wolves. The research that has been done is valuable to all game management agencies. Working together is also good for the state's economy since seeing wolves in Denali NP is a big draw.
Dave Bachrach	3/7/15	99603	
Gerald Brookman	3/6/15	99611	
Edith Crowe	3/8/15	99623	Why do we need to destroy everything??
Joanie Martinez	3/8/15	99631	The wolves are a huge part of the attraction of Denali National Park. We Alaskans along with friends and family who we bring to the park have been saddened in recent years to not see a single wolf. Please reinstate the buffer zone so the wolves will not be killed when they leave the park in winter to feed.

			I support the petition but would also like to add a statement in general. STOP killing wolves
			and bears. Humans are not all that capable even scientifically to manage wildlife. Let nature
Kathy Wells	3/6/15	99645	run wild!
kim	3/6/15	99645	
			Please protect our wolves. People come from all over to see the wildlife here. Keep them
Clare King	3/7/15	99645	safe!
ron macki	3/6/15	99654	please protect the wolves of denali
Thomas Klein	3/5/15	99676	
Bee Long	3/6/15	99676	PPI
Josh Klauder	3/6/15	99676	
John Porter	3/7/15	99676	
Gordon Boeve	3/6/15	99688	
Susan Grace	3/8/15	99708	Please do the right thing and protect the wolves of Denali!
Douglas McIntosh	3/6/15	99709	One of the joys of Alaskan life is wildlife in abundance and variety. This includes wolves.
Jessica Girard	3/6/15	99709	
			The Alaska Board of Game needs to take into consideration the value of robust predator
Ron Yarnell	3/6/15	99709	species near and around our National Parks.
Michael Burton	3/7/15	99709	AK
Brenda Greeley	3/7/15	99709	
Anna Sorensen	3/7/15	99709	
Cherish Yuke	3/7/15	99709	
James Kowalsky	3/5/15	99710	This is long overdue but with a board of game that is so exclusiónary in
Susan Vogt	3/6/15	99712	
Scott Chesney	3/6/15	99712	It's time for the State of Alaska to end its war on predators.
Lynn Conrad	3/6/15	99723	
Aase Dane	3/6/15	99729	
Jan St Peters	3/5/15	99743	
			Tourists spend millions to visit our beautiful state and see our amazing wolves. Denali is the
Joyce Oswald	3/5/15		best place for them to do that, save the wolves for all to enjoy.
Brian Napier	3/5/15		We appreciate your time in considering this matter. Regards.
Tim Russell	3/5/15		Protect the Denali Wolves
Anja Phenix	3/5/15	99743	

Jon Nierenberg	3/6/15	99743	Jon Nierenberg and his businesses EarthSong Lodge and Denali Dog Sled Expeditions, located on Stampede Road in the Wolf Townships, fully support Denali Citizens Council's initiative for a closure in this sensitive area. Our businesses benefit from a stable wolf population in and around the park.
Elwood Lynn	3/6/15	99743	Wolf view ability is critical for tourism within the state and in particular Denali. If the state is serious about diversifying its revenue streams and sources then increasing the protection for wolves around Denali is critical. A handful of wolf pelts does far less for this state than tourism. While subsistence is important it takes gainful employment to make it viable. Restricting the wolf take in this small area will have a negligible impact on the moose population, but will have a huge impact on the visit for hundreds of thousands of visitors.
Kate Weber	3/6/15	99743	Protect Denali wolves
Christine Byl	3/6/15	99743	
Sheila Craig	3/6/15	99743	
Gina Soltis	3/6/15	99743	
Gabriel Travis	3/7/15	99743	A healthy wolf population is integral to the integrity and overall health of this part of Alaska. Please vote to give the wolf population a chance to recover.
Kathryn Krueger	3/7/15	99743	
Adrianna Lenard	3/8/15	99743	
Bill Watkins	3/5/15	99755	AK
Anna Hinckley	3/5/15	99755	It just makes sense
Mary Horwedel	3/5/15	99755	
Jasmin Stewart-Ebben	3/5/15	99755	Please protect Denali Wolves
Jennifer Reifler	3/5/15	99755	please protect the wolves
Stephanie Ford	3/5/15	99755	
Peter Berman	3/5/15	99755	If you must reduce wolves to an economic commodity the answer is simple: protect Denali wolves!
Erica Watson	3/5/15	99755	Thank you for considering this reasonable approach to managing this important habitat.
Robert Burrows	3/5/15	99755	These wolves are more important to our community alive!
Caleb Johnson	3/5/15	99755	people pay to see our amazing wolfs, protect them!
Dorothy Olmstead	3/5/15	99755	
Carrie Skinner	3/5/15	99755	

Cindy Arnold	3/5/15	99755	
David Cohen	3/5/15	99755	Please protect Denali wolves!
Alan Seegert	3/6/15	99755	Please!
Gary Borenstein	3/6/15	99755	
Michael Boyce	3/6/15	99755	
Becky Irish	3/6/15	99755	
Bob Tourtelot	3/6/15	99755	Please protect the wolves!
NJ Gates	3/6/15	99755	
Kristine Fister	3/6/15	99755	
Juliette Boselli	3/6/15	99755	I fully support a buffer zone to protect Densli wolves on state lands along the northeast boundary of the Park.
Jan Tomsen	3/6/15	99755	The wolves which live in the Denali area are appericated by hundreds of thousands of Americans each year who journey here to have a chance of glimpsing a top predator in an intact ecosystem.
Kate Batten	3/7/15	99755	
Cass Ray	3/7/15	99755	
Dale Ebben	3/8/15	99755	The Park Visitors are EUPHORIC to see Wolves. Please protect them NOW.
Denny Capps	3/8/15	99755	A reasonable buffer to protect a key ecosystem species.
Linda Shaw	3/6/15	99801	I visited Denali the summer of 2013 and took an excellent class on the seminal wolf research done there by Adolph Murie and Gordon Haber. It was shocking that all that knowledge comes to nothing in how wolves are "managed" in Alaska. We did not see or hear a single wolf despite visiting the areas that those biologist used to observe them from a distance. It was incredibly embarassing to me and as an Alaskan and eye opening for the out of State visitors as to how Alaska fails to protect the Denali ecosystem.
Mark Miller	3/6/15	99801	
Nancy Simpson	3/6/15	99801	
Katie Fearer	3/6/15	99801	
Jeff Sloss	3/6/15	99801	
John Gaguine	3/7/15	99801	
jean hoegler	3/7/15	99801	
Margo Waring	3/7/15	99801	
Matt felix	3/7/15	99801	

We the undersigned urge the Alaska Board of Game to prohibit the killing of wolves on state lands at the northeast boundary of Denali National Park.

Robert Sylvester	3/6/15	99802	Habitat loss, climate change, overhunting of moose, caribou etc. cannot be cured by killing wolves. A one tool tool box is not the way to build a solid house. is not are
Patricia OBrien	3/6/15	99803	It is time to recognize the value of wolves through a buffer zone, both for their intrinsic value as well as the value to tourism.
Dorothy E. Cuadra	3/7/15	99803	Denali wolves have already lost way too many pack members because of lack of this buffer zone. We need this buffer zone right away.
Jos Bakker	3/6/15	99821	
Lorraine Murray	3/9/15	99821	
Melanie Heacox	3/6/15	99826	Please initiate a buffer zone, it is long overdue. Thank you.
Debbie Day	3/7/15	99829	
David Beebe	3/6/15	99833	The Alaska Board of Game must address its constitutional obligation to sustainable yield management principles instead of mismanaging predator/prey dynamics in the wake of prior mismanagement. Solutions must recognize and address causation of the problem not manipulation of the effects of the problem.
Larry Trani	3/7/15	99835	No shooting of Denali wolves!!!
Nola Lamken	3/6/15	99840	If we're going to have a national park and expect visitors to come from all over the world, we HAVE to maintain the wildlife there! Allowing peripheral "take" compromises all the protections. Then the rest of the wolves go nuts. We need SOMEplace where wildlife can be free of pressures and develop naturally.
Cheryljennings	3/7/15	99840	