



United States Department of the Interior
NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:

9.A.2.(AKRO-DRD)

APR - 3 2013

Mr. Doug Vincent-Lang, Acting Director
State of Alaska, Department of Fish and Game
Division of Wildlife Conservation
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Mr. Vincent-Lang:

Thank you for your letter dated February 14, 2013, regarding wildlife authorities and the conservation of park resources. Your letter provided extensive comments regarding the National Park Service (NPS) 2013 proposed compendium. The National Park Service considered these comments, along with all others received, in formulating our final decisions regarding the 2013 compendium.

Consistent with previous years' practice, the NPS is responding to all comments received on the proposed 2013 compendiums, including the comments received from the State, in the preamble to the 2013 final compendium, which is enclosed. This year, over 59,000 comments were received.

Your letter suggests that the State does not believe there are any sustained yield concerns, and thus no basis for NPS actions. As has repeatedly been communicated in writing and verbally, the differing legal frameworks for the State of Alaska and the National Park Service compel each of our agencies to assess issues associated with wildlife management and the national park areas differently. We look forward to continued engagement and discussion so that the long history of cooperation between our two agencies can continue.

Sincerely,

Joel L. Hard
Deputy Regional Director

Enclosure

PREAMBLE TO FINAL 2013 COMPENDIUMS

Summary of Comments and Response to Comments on Wildlife Related Provisions

13.40(e) Temporary closures or restrictions to the taking of fish and wildlife

The NPS is adopting the restrictions as published on taking brown bears, black bears, wolves, and coyotes in several preserves. Between December 2012 and January 2013, the NPS held seven public hearings in various locations in or near the affected NPS units. These hearings were attended by nearly 75 people. Of those, roughly the same number of participants opposed as supported NPS restrictions.

In addition to the hearings, over 59,000 timely written comments were received on the wildlife related restrictions. Of the comments received, the majority were email form letters, many of which were personalized by individuals who added comments or modified the message. Of the comments received, roughly a dozen commenters opposed the proposed restrictions. Below is a summary and response to the substantive comments received. They are organized by subject: process, authority, determination of need/justification, comments relating to all species, and species specific comments.

While the NPS recognizes that the State provides for multiple types of wildlife take, including subsistence and personal use for all Alaskans; for the purposes of this document, when the term “subsistence” is used, it refers to “subsistence uses” by rural residents only, as defined by Title VIII of ANILCA and administered by the Federal Subsistence Board (FSB).

I. Process

The State objects to the wildlife related compendium provisions saying that they are being adopted “without process, explanation, or justification.” State and FSB regulations are usually adopted following one public meeting. The Service held seven in-state hearings and several smaller meetings, issued several press releases on the subject, used social media to hold two online meetings, and took written comment prior to adoption. These efforts generated approximately 59,000 comments.

Most comments received asked for formal rulemaking to permanently place the restrictions in the CFR. While this may be appropriate in some situations generally wildlife management requires periodic management actions. The process of managing wildlife resources according to legal and policy framework can require use of emergency, temporary, or permanent closures or restrictions, not always in that order. Even when the action implements a long-term objective, short-term circumstances may change, precluding publication in the CFR.

The NPS remains committed to managing park resources and values in a way that avoids unnecessary interference with State management of wildlife resources. The vast majority of State general hunting regulations remain applicable in the preserves.

The NPS has consulted with the State of Alaska, including through the Board of Game (BOG) process, and requested the State to exempt NPS Preserves from these authorizations. The NPS prefers a State regulatory solution to this conflict rather than annual restrictions or permanent closure or restrictions. Using the temporary closure process affords the State the opportunity to

resolve the conflict in lieu of a Federal rulemaking. If that were to happen, the NPS would not need to act.

Two commenters suggested a longer comment period to accommodate advisory committees. The compendiums for Alaska park areas are updated on an annual cycle. Comments are welcome at any time throughout the year. The comment deadline only relates to which annual cycle the comment will be considered. For example, the NPS received a comment on February 19, 2013. This comment will be considered during the 2014 compendium cycle.

Roughly three comments contend these restrictions are highly controversial and as such must be published as rulemaking in the Federal Register under 36 CFR 1.5(b). Even if these three restrictions or the State allowances on which they are based are highly controversial, NPS-Alaska specific regulations modify general NPS regulations by applying the requirements of 36 CFR 13.50 to closures or restrictions to taking wildlife. Section 13.50 does not address controversy as a criterion for restrictions.

The State, Citizens' Advisory Committee on Federal Areas (CACFA), and Alaska Professional Hunters Association (APHA) suggested additional hearings were warranted, including in each resident zone community. The NPS does not agree that additional hearings were warranted. The NPS values broad public involvement and must balance that with the responsibility to be good stewards of taxpayer dollars. It would not be a responsible use of taxpayer dollars to conduct hearings in each of the 50+ resident zone communities. The regulations require notice and hearings in the "affected vicinity." The NPS held at least one hearing near each affected Preserve. The NPS also invited written comments, held informal meetings with interested persons, and employed social media to reach a broad audience in Alaska and elsewhere. We note the proposed compendiums generated thousands of written comments, and are not convinced the public is more likely to attend a hearing or meeting than provide written comment. We also note that the online meetings hosted by NPS generated interest by more than 30 individuals—1/2 the number of individuals reached in all seven hearings combined—and didn't spend any taxpayer dollars on travel.

CACFA objected to the NPS decision to hold hearings prior to publishing the proposed compendium. NPS regulations provide that a hearing be held in the affected vicinity prior to adopting restrictions on taking fish or wildlife. That requirement was met as discussed above. The NPS issued press releases prior to the hearings that discussed the NPS proposed restrictions. Holding the hearings prior to the publishing the proposed compendiums allowed the Service to use that input to craft the determinations of need as well as provided the public with two opportunities for input on the proposals. Accordingly, the NPS believes regulatory requirements were met and the public was informed.

The State commented that the NPS does not adequately use the BOG process. While there is not a legal requirement for NPS to use the BOG process, the comment is not accurate. For many years, the NPS has made proposals to the BOG and has provided numerous comments on proposals affecting NPS areas. It is well documented that the BOG and FSB processes are used for nearly all wildlife harvest regulation in NPS areas. The wildlife provisions listed in the compendium are a tiny fraction of—and a last resort—for actions relating to NPS areas.

Disagreement is not the same as failing to listen to or respect others' views. The NPS is following the legal and policy framework applicable to NPS areas.

One person described the compendium process as a “frivolous administrative burden” and a contradiction of the cooperative intent of the Master Memorandum of Understanding (MMOU) with the Alaska Department of Fish and Game. The compendium is a longstanding system-wide process for individual parks to list local rules adopted under discretionary authority. The NPS disagrees with the notion that such action is inconsistent with the MMOU with ADFG. Under this MMOU, the “National Park Service areas were established, in part, to ‘assure continuation of the natural process of biological succession’ and ‘to maintain the environmental integrity of the natural features found in them.’” In the MMOU, the NPS agrees to recognize the State as the “agency with the primary responsibility to manage fish and resident wildlife” and “utilize the State’s regulatory process to the maximum extent . . . when proposing changes in existing State regulations governing or affecting that taking of fish and wildlife on Service lands. . . .” Likewise, the state agrees in the MMOU to recognize the Service’s “responsibility to conserve fish and wildlife and their habitat and regulate human use on Service lands in Alaska.”

The State suggests that an analysis is required under section 810 of the Alaska National Interest Lands Conservation Act (ANILCA). The NPS does not believe this is the case. Section 810 is triggered by an action to “withdraw, reserve, lease or otherwise permit the use” of public lands. The NPS is not proposing a use; rather the Service is prohibiting a use authorized by the state.

II. Authority

One individual commented that the practices being prohibited by the NPS are inconsistent with the legislative purposes of the NPS Preserves. It is the NPS’s interpretation of our legal and policy framework that guides our actions, as discussed in the determination of need.

The State commented that the relationship between the Organic Act, Redwoods Amendments, ANILCA, and NPS Management Policies are not clear. The Service believes this has been adequately explained on multiple occasions, including the determinations of need, written correspondence, in-person meetings, and other publicly available documents (including NPS Management Policies).

The NPS received comments from the State, CACFA, and the APHA questioning NPS authority to adopt and list restrictions in the compendium. This comment is without merit. The Service believes this has been adequately explained in these determinations of need as well as other publicly available documents.

The State comments that these restrictions are not authorized because ANILCA provides for consumptive uses of wildlife. While ANILCA authorizes the take of wildlife for sport and for subsistence uses by rural residents, it does not follow that all means, methods, seasons, or bag limits adopted by the State are appropriate in all portions of NPS Preserves. Such hunting and trapping activities must be consistent with the legal and policy framework for NPS areas. The State points to section 815 of ANILCA to support their argument that these provisions are not lawful. This section provides

Nothing in this title shall be construed as . . . authorizing a restriction on the taking of fish and wildlife for nonsubsistence uses on the public lands (other than national parks and park monuments) unless necessary for the conservation of healthy populations of fish and wildlife, for the reasons set forth in section 816, to continue subsistence uses of such populations, or pursuant to other applicable law

By its own terms, section 815 states that *nothing in Title VIII (subsistence)* authorizes restrictions to nonsubsistence take of fish or wildlife unless for one of the four enumerated reasons. These restrictions are not based on Title VIII. They are based on the authorities of the NPS Organic Act and other laws applicable to the NPS, including their implementing regulations and established NPS policy. Also, the state comment ignores the last clause of this section that allows for restrictions based on “other applicable law,” as well as section 1313 of ANILCA which specifically speaks to the Secretary’s authority to restrict take for sport purposes for “public safety, administration, floral and faunal protection, or public use and enjoyment. . . .” In addition, ANILCA section 1314(c) reinforces that “the taking of fish and wildlife in conservation system units shall be carried out in accordance with the provisions of ANILCA and other applicable State and Federal law.” (emphasis added).

APHA argues that ANILCA allows the Secretary to close an area to hunting or prohibit hunting during a specific timeframe, but not adopt more limited restrictions on certain methods or seasons. It is not reasonable to conclude that Congress would provide the Secretary with authority to completely prohibit hunting in certain areas or at certain times but not allow for more limited restrictions. This is supported by the remaining language of 1313 which provides procedures for adopting “restrictions” as well as the legislative history cited by the State of Alaska regarding reasonable regulation of hunting: “Section 203 clarifies that such use of wildlife resources within areas designated by sections 201 and 202 as National Park Preserves shall continue subject to reasonable regulation, including the provisions of title VIII.” Senate Report 96-413, page 168. The NPS has consistently implemented ANILCA in this fashion. See, e.g., 36 CFR §§ 13.40(d)(4), (e); 13.1202.

APHA argues that the NPS is using policy to preempt state law. The NPS agrees that policy does not preempt law. NPS Management Policies represent the Service’s interpretation of the NPS Organic Act and other authorities and provide the park superintendents with direction on how to implement these statutes. When activities conflict with the legal and policy framework for NPS areas, such activities may be prohibited or restricted. That is the case here.

The State commented that the State has primary responsibility for managing wildlife in Alaska, including on most Federal lands. The NPS does not dispute the State’s authority to manage wildlife. However, under Federal law, the NPS also has a responsibility to manage wildlife on NPS lands. The NPS does not interpret ANILCA to provide “exclusive Federal control” over wildlife in preserves. The NPS recognizes the State as the primary entity responsible for managing sport hunting (other than under Title VIII) in NPS preserves. However, state regulations must be consistent with the legal framework applicable to NPS areas. In the event such regulations are not consistent with management of park areas, the NPS may adopt reasonable regulations in order to fulfill responsibilities for managing NPS areas. It is important to note that hundreds of state hunting provisions are applicable in NPS preserves, and these will

remain applicable in NPS preserves. Only a few State regulations have been determined to be in conflict with the legal and policy framework for NPS areas.

The State comments that ANILCA allows for all types of hunting in NPS preserves. Congress authorized take for subsistence and for sport purposes. ANILCA section 1314(c) makes clear that while taking of wildlife is allowed, it must be carried out consistent with all other authorities applicable to the NPS.

III. Justification/determination of need

Many of the comments opposing the NPS restrictions made it apparent that some commenters either do not understand or acknowledge differences between state wildlife management objectives and NPS management objectives which are the basis for these restrictions. The state manages wildlife for “sustained yield” under the state constitution (Alaska Constitution, Article VIII, §4), defined by state statute as “the ability to support a high level of human harvest of game.” A.S. 16.05.255(k)(5). State management is further guided by state statutes to “restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals. . . .” A.S. 16.05.255(e). Further, according to the state’s written comments, state wildlife management actions are designed to “influence the reproduction and survival of [wildlife] populations.”

The NPS manages neither for abundance nor sustained yield. Management actions designed to “support a high level of human harvest” are inconsistent with the legal and policy framework for NPS areas. Wildlife stewardship on National Park Service managed lands in Alaska is to maintain natural processes, provide for subsistence opportunity by rural residents, and allow taking of wildlife for sport in preserves as provided by ANILCA. The NPS must balance consumptive uses of wildlife with other uses and values, as more fully discussed in the determinations of need

Among those opposing the NPS restrictions, several comments took the position that a population viability concern is requisite for NPS action and that scientific data must show impairment or an adverse impact to resources. In a similar vein, several comments suggest that harvest attributable to new state sanctioned methods or extended seasons is negligible or nonexistent and consequently the restrictions are not addressing a biological concern. The presumption of these commenters that a biological population concern is necessary for NPS action is not accurate.

Under Federal law and policy applicable in NPS units, the underlying objective in managing park lands extends beyond maintaining a viable population. NPS Management Policies call for the conservation of natural abundance, behavior, distribution, and ecological integrity of native wildlife species (*see* NPS Management Policies § 4.4.1). While harvest under these new methods may be limited, the NPS must view authorizations cumulatively. Increasingly, State authorizations seek to manipulate populations in the interest of reallocating prey from predators to humans, a practice which is outside the legal and policy framework applicable to NPS areas.

The NPS agrees with the sentiment behind the comments calling for more data, however the absence of data does not preclude the NPS from taking action to protect resources and values of

parks. The NPS is not required to host population manipulation or other management activities designed to encourage abundance of favored species. The NPS operates under a precautionary principle, which means until an action is shown *not* to disrupt naturally-occurring populations or naturally-occurring ecological processes, those actions are not to be authorized on NPS areas. NPS Management Policies articulate the Service's expectations of managers to avoid impairment (NPS Management Policies §§ 1.4.7, 1.4.7.1, 1.5). Thus, for those commenters who expect the Service to prove impairment, this is a misinterpretation of NPS management guidance.

The State argues there is no link between State regulations and potential impact to park values or resources. The Service believes the link between state regulations and the NPS actions has been adequately explained in the determinations of need as well as responses to the State's comments in previous years. Similarly, rather than the NPS showing specific cause and effect relationships between state authorizations and possible impairment, the burden of proof lies with the ability to prove that there is no possibility of new or additional state authorizations disrupting naturally-functioning ecosystem processes (*see* NPS Management Policies §§ 1.4.7, 1.4.7.1, 1.5). In fact, it is the frequent changing of state authorizations that compels NPS to consider temporary restrictions on an as-needed basis rather than immediately initiating rulemaking.

The State notes that predator control was conducted many decades ago in McKinley Park and suggests predator control is necessarily appropriate in NPS areas. Such practices causing deviation from naturally-functioning ecosystems were repudiated by the NPS long ago as being inconsistent with the standards to which national park areas are to be managed. Since that time, the fields of wildlife ecology, conservation biology, conservation genetics, nutrient flow, etc. have advanced tremendously. Some practices thought to be sound in the past are simply no longer regarded as such by the NPS. Similarly, the State asked the NPS to explain how prescribed burns in NPS areas are consistent with natural processes while predator control is not. The NPS appreciates the opportunity to clarify this point. The goal of prescribed burns in remote areas is to restore a naturally functioning ecosystem following decades of fire suppression. This is counter to management activities (e.g., predator control, habitat manipulation) designed to benefit harvest opportunities of one native wildlife species at the expense of another.

The State claims that the allowances at issue here do not constitute predator control or are not likely to have that effect. Transcripts from BOG meetings reflect frequent and consistent discussions as to whether the take of brown bears over bait, longer seasons on coyotes or longer seasons on wolves would help elevate the survival rate of moose or caribou calves. As acknowledged by the state, such actions are designed to "influence" populations. Whether labeled predator control, intensive management, abundance-based management or another term, the practical effects of manipulating one population to affect another are contrary to the NPS legal and policy framework as discussed in the determinations of need.

The State comments that it is not clear what "natural" means in the context of preserving natural processes. The State suggests that the National Park Service considers any human influence to be "unnatural." The NPS recognizes that virtually every form of human activity that occurs within a park area has some degree of effect on park resources or values (*see* NPS Management Policies § 1.4.7.1). This does not mean that use must be disallowed. Rather, uses are examined in context of their impact, or potential impact, on park resources and values (*see* NPS

Management Policies § 1.5). Federal regulations recognize subsistence use as a part of the ecosystem (*see* 50 CFR 100.4). The NPS agrees that it would be helpful to develop a common vision of what “natural” wildlife populations in NPS areas would look like. Consistent with the State’s recommendation, the NPS recently held a workshop and invited ADFG and other partners to participate. ADFG declined to attend. The State also suggests defining the term “natural” quantitatively. The term “natural” in NPS areas is defined by policy rather than population biology, and therefore calls for a qualitative rather than quantitative definition. Such numerical metrics would not take into account other uses or values related to wildlife or the varying conditions and legislative purposes between NPS units.

One person commented that the NPS should “dedicate itself to real conservation efforts that are positive for Alaska wildlife populations and the Alaskans who depend on them[.]” The NPS agrees with this comment and also notes that NPS lands must be conserved for all Americans and future generations.

IV. General comments for all species

General comments were received from all over the country, including Alaska. Over 59,000 comments objected to recent state-sanctioned practices as being inconsistent with generally accepted hunting practices. These commenters described these activities as “not sustainable,” “cruel,” “barbaric,” “unsporting,” “unethical,” “inconsistent with fair chase,” and “danger[ous] to humans and wildlife.” Additional comments were also received in support of the NPS position that intensive management of wildlife is not appropriate in NPS Preserves.

The NPS received several comments requesting further restrictions on hunting, including making the provisions permanent as well as prohibiting: all take, all sport take, all baiting, snaring bears and wolves, take during breeding/nurturing seasons for all predator species, hunting wolves/coyotes year round, using poison or gas, and protecting wildlife on lands adjacent to NPS areas. Another comment stated that hunting activities that are “not sporting or not consistent with fair chase should be prohibited.” As articulated in rulemaking concerning the same day airborne take of game; the NPS interprets sport hunting as being consistent with the principles of fair chase. These comments are outside the scope of the NPS proposed action.

A couple commenters state that the NPS restrictions limit subsistence. While Federal qualified subsistence users may also take wildlife under applicable state regulations, these restrictions do not override current Federal subsistence regulations. In the event that a Federally qualified subsistence user desires an additional practice to be authorized, proposals may be made to the FSB.

The NPS received several comments on predator-prey distribution. A few commenters expressed the view that by adopting these restrictions, the NPS is favoring predators. One commenter stated that predator-prey ratios should be determined by nature. Another individual commented that current levels of biodiversity should be preserved. Another individual implied that by permitting these state allowances to occur in preserves, the NPS preserves would be essentially private hunting areas. Under the NPS legal and policy framework, natural processes, including natural integrity, abundance, distribution, and diversity of native species is protected.

It is outside of NPS legal and policy framework to reallocate prey species from predators to humans; nor is the NPS charged with managing to “support a high level of human harvest.”

A few commenters objected to NPS wildlife management while other comments suggested the Department of the Interior should be more involved in wildlife management. The NPS believes the current legal framework provides the proper balance for wildlife management.

The NPS received a number of comments objecting to state wildlife management practices with respect to predators and general state wildlife goals/priorities. While the NPS is responding to recent state authorizations for taking wildlife by adopting restrictions for the affected preserves, it is not appropriate for the NPS to respond to comments on the State’s policies. The proper venue to address these concerns is with the State of Alaska.

V. Species specific comments

Black Bears

A couple commenters suggest that the practice of taking black bear cubs and sows with artificial light at den sites is a traditional practice by Native people. Other state that such practices are not traditional, not fair chase, and are “unconscionable.” The state also commented that recently adopted state regulations authorized a subsistence practice. To the extent such practices, which have been prohibited by State regulations for a number of years, are a customary and traditional practice by rural residents, proposals may be made to the FSB to consider allowing such use by Federal qualified rural residents for subsistence purposes in preserves. These points have been addressed in previous compendiums (*see, e.g.*, 2010 proposed and final compendium for Denali National Park and Preserve).

A few comments were received stating that harvest of black bear cubs and sows with artificial lights at den sites would be minimal and have only a negligible effect. A few commenters also stated that the closure cannot be justified unless there is a biological concern for the sustainability of the population and in that event, the State would issue an emergency closure. As stated above, viability of native wildlife populations is but one factor the NPS must consider when balancing uses and values in parks and preserves. As such, allowing these activities to take place in NPS Preserves could result in an unacceptable impact to park resources.

Brown Bears

The vast majority of commenters objected to taking brown bears over bait. Some commenters also noted opposition to taking black bears over bait. Several commenters expressed concern that these practices will lead to more food conditioned bears and possible hazard to people. Comments were also made that this method of take is unsporting.

The practice of allowing take of bears—brown or black—over bait has long been questioned for the reasons noted above. As noted by the state “a substantial percentage of Alaskan hunters do not support bear baiting” because of concerns over “food conditioning,” “safety issues,” and “the lack of adherence to ‘fair chase’ tenets[.]”

<http://www.adfg.alaska.gov/index.cfm?adfg=bearbating.history>. The state also warns hunters operating a bait station about the dangers of having brown bears at the bait site—to the hunter—as well as others who use the area. The NPS agrees with these statements.

One organization stated that taking brown bears over bait is not a new practice. To the extent this comment is accurate, the practice has been illegal throughout the State until just recently. The NPS is not aware of any other state or country that currently sanctions this activity.

A few comments in support of allowing take of brown bears over bait argue that these activities will not increase food conditioned bears since black bear baiting is authorized. One person states taking brown bears over bait stations only poses a minimal risk to visitors or other people using or living in the area. The basis of this comment was the relatively remote locations where baiting is authorized and the requirement that bait stations be located at least a mile from a house, campground, school, or business. Spatial separation between bait stations and human development is inadequate in mitigating this issue as bears have large home ranges and can easily move tens of miles in a day. Additionally, the NPS cannot support the position that if only a few people reside in or use the affected area, that somehow their safety need not be a concern. We also note that bear baiting has been prohibited in Denali State Park, presumably to minimize user conflicts.

A few commenters stated that brown bear take would be limited and consequently not have an impact on bear populations. As stated in the determination of need there are very limited data available to evaluate the potential effects of this practice. Very little reported black bear baiting harvest has occurred on NPS lands over the past three decades (<2 bears /year). The NPS does not expect population level effects from these practices, however bear baiting by its very design alters natural behaviors. Further, it is universally accepted by the scientific community and state and Federal management agencies that bears habituated to human food pose a greater public safety risk to humans and are more likely to be killed by humans through methods other than legal sport or subsistence harvest. Urging people not to food-condition bears is a central theme in the public education efforts of agencies across the species' range.

One person asked for clarification on the difference on between taking brown bears over bait and black bears over bait. While this compendium only addresses the recent allowance for taking brown bears over bait, the same concerns and policy conflicts exist for the practice of black bear baiting and this topic warrants further consideration.

Wolves/Coyotes

The Eastern Interior Regional Advisory Council asserted that coyotes were not in the area previously. The NPS agrees that the range and extent of coyotes in Alaska has expanded and retreated over the decades. While coyotes may have been sparsely distributed in the State of Alaska, evidence of the existence of coyotes prior to Russian or European settlement has been found in several instances. For this reason, the NPS does not treat coyotes as an invasive or introduced species.

APHA commented that the NPS is not legally permitted to comment on the value of wolf or coyote pelts. This claim is baseless. NPS knows of no statutory authority prohibiting the agency from assessing a resource. Others asserted that pelts always have some value, even if to a trophy hunter or for other subsistence-related uses, thus harvest when pelts are not prime is acceptable. As stated in the determination of need, the restrictions will result in no harvest during the period

when wolves and coyotes are denning and raising offspring and their pelts have little trophy or economic value. Similarly, the season dates in this compendium are largely consistent with long-standing State and Federal season dates, thus there is little to no opportunity lost relative to recent years.

The Alaska Wildlife Alliance requested that wolf take be ended in Denali until populations rebound. Many others asserted that stronger protection of wolves is called for or that hunting and trapping seasons should be shortened or eliminated in park areas. The NPS supports sport and Title VIII subsistence harvest as authorized by ANILCA. If the population of wolves in Denali National Park & Preserve continues to decline, the NPS may consider management actions.

13.50 Temporary Closures and Restrictions

The State and CACFA restated their objection to the NPS interpretation of regulations regarding closures. The Service believes this has been adequately explained on multiple occasions, including in-person meetings and the 2010 Final Compendiums (see, e.g., Preamble, 2010 Final Compendium for Denali National Park and Preserve).