



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Department of Fish and Game

DIVISION OF WILDLIFE CONSERVATION  
Headquarters

RC 032

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### Comments on Emergency Petition to Close Wolf Hunting and Trapping near Denali National Park.

The supposition by the petitioners that the wolf situation in Denali was "unforeseen and unexpected" 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clearly stated on the record that take of wolves within the buffer that was in place at that time (but which was rescinded at that meeting) would likely lead to occasional trapper/hunter take of wolves that used the east end of Denali NP. Therefore, take of wolves that use the park was neither unforeseen nor unexpected, but was actually predicted.

The supposition that there is a "threat to a game resource" is disputable on two points:

1. The current low population of wolves may be unprecedented for Denali NP, 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.
2. There is one clear-cut example of how the take of a wolf reduced the ability to view wolves in the park. However, the claim that this will have a negative effect on economic benefit to the state has not been substantiated (the petition refers only a visitation rate of 400,000) and, therefore, appears to be conjecture.

The petition does not appear to fulfill the requirements of an emergency.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Dale".

Bruce Dale  
Director, Division of Wildlife Conservation