

Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811  
FAX: 907-465-6094

Feb. 17, 2012

RE: Proposals for Spring Board of Game Meeting, Fairbanks, Alaska, March 2- 11, 2012

Members of the Alaska Board of Game;

Thank you for the opportunity to comment on proposals from the 2011/2012 Proposal book for the Interior Region (Region III) Game Management Units, to be considered at your Spring 2012 meeting in Fairbanks.

These comments represent the board and members of the Denali Citizens Council a small, grassroots public education and advocacy organization, founded in 1974 in Cantwell and headquartered at Denali Park, whose interests include both Denali National Park and the park's gateway communities. We've been involved for several years in encouraging collaborative planning for the Wolf Townships, west of Healy and surrounded on three sides by the national park. Our comments on each proposal before you are listed below.

**Oppose Proposal 213 (authored by the Fairbanks Advisory Committee)**

Many of our members live and recreate in the Yanert River Valley, an east-west trending upland area in the Alaska Range emptying into the Nenana River as it passes Denali National Park. The Yanert River is a fast-moving, glacial river that also receives fresh water from streams both north and south. Ground cover is composed mainly of moist, brushy uplands and occasional stands of spruce. There is a pinch point a few miles up the Valley where travelers use the braided Yanert River in winter. Access from the Parks Highway at the Valley's western edge is limited to one 17(b) easement across Ahtna lands. A small airstrip near the head of the Valley provides bush plane access.

The Yanert Valley is currently one of the few remaining areas declared non-motorized for hunting and hunting support. Its relative isolation, nestled in the Alaska Range and surrounded on three sides by mountains, promotes its easy identification as a discreet Controlled Use Area. It is popular for horseback hunting and with individuals who enjoy a quiet backcountry experience. It is logical to continue this special designation for at least two reasons – Alaska hunters want it and it is easily demarcated geographically.

---

DCC Board

Nancy Bale  
Anne Beaulaurier  
Jean Balay  
Cass Ray

Hannah Ragland  
Nan Eagleson  
Jared Zimmerman  
Charlie Loeb

Julia Potter, Community Organizer

We think that the Fairbanks AC, which authored this proposal, did not understand the hunting culture of the Yanert Valley, nor did that AC understand the particular access constraints that apply there. There is a buffer of Ahtna-owned land between the Parks Highway and state lands open to hunting in the Yanert Valley. These Ahtna lands are crossed by a single, narrow 17(b) easement. There is no dedicated parking off the highway for hunting vehicles, and no state lands where one could be designated. Even with horse hunting, vehicles are seen strung along the shoulder of the Parks Highway during hunting season, as there is no off-road place for them to park. Because access from the Parks Highway is largely through private lands, conflicts with several home owners are simply inevitable. Increasing this conflict by adding the late season motorized hunt is not in the best interests of the state or hunters.

The Yanert Valley is within Unit 20A, however it is its own little ecosystem. The excesses of moose identified for other parts of 20A have not been noted here, and hunting for antlerless moose is not considered necessary by locals, nor is it popular. The late season motorized hunt proposed by this proposal would be entirely for antlerless moose, whose overabundance in this area has not been proved. The department must also consider the general unpopularity of antlerless hunts in 20A, evidenced by a recent vote by the Middle Nenana Fish and Game Advisory Committee. The Department has already reduced harvest quotas in 20A. A late season hunt in the Yanert Valley – is it even desirable at all?

Motorized problems – A late season hunt was originally pitched as a snowmachine hunt, however if Fish and Game institutes a motorized hunt after September 30<sup>th</sup>, it will be an ATV hunt, since snow cover is unreliable in this area until mid to late November on some years. Damage to existing trails and the creation of new, rutted trails in this vulnerable valley are inevitable. Similarly, the braided area of the Yanert is classically unstable for travel in the early season and is always subject to overflow, the bane of dog mushers and skiers, and a real danger for snowmachine travelers.

You are aware that the Middle Nenana Fish and Game Advisory Committee has voted against this proposal. This very fact indicates that a variety of reasons exist NOT to pass this proposal, reasons that have already been explored and examined by the AC. We urge you to leave the Yanert Valley CUA as it is. A variety of hunters, recreationists and local citizens will be relieved if you do.

**Oppose Proposals 227-232 (authored by the Fairbanks AC or members of that AC)**

Unit 20C is a large, diverse area extending north from Denali National Park to the Tanana River and including just about every habitat type that exists in Alaska. Western portions of the area are roadless backcountry where locals have long hunted and trapped for subsistence, areas closer to the road include private property with a variety of trails. Much of the area is wet, with abundant permafrost and several rivers. The area contains Lake Minchumina, the Wolf Townships, the Nowitna National Wildlife Refuge, parts of Denali National Park, and acres of spruce, taiga and bog. If there ever was a diverse area from both a habitat and a management standpoint, this is it.

This area will not lend itself to management with a one-size-fits-all intensive management strategy - there are simply too many different habitats, animal populations and human cultures within this one area. The department has been devoting its census work elsewhere and does not have data to cover the overall health of this area's resources. There is simply little or no evidence, other than anecdotal, of a problem

with too many predators, nor is there an overall knowledge of whether the habitat can support more moose. The Middle Nenana Fish and Game AC voted these proposals down, indicating their skepticism about whether they are warranted. These proposals are simply too big and are not justified by data. Please do not approve the intensive management plans detailed in Proposals 227 and 229. In addition, control of wolf predation is not indicated by data in 20C, and is not appreciated or desired by locals. Please vote down Proposal 228.

The three proposals advocating liberalization of regulations to allow taking of black and grizzly bears are simply unproved and premature at this point. In addition, the Board of Game, if using them at all, should target these types of activities to areas where an overabundance of bears can be proved to be harmful. Such proposals should have sidebars and their language should be tight and specific. Proposal 230 is simply too broad and unspecific and includes baiting of brown bears without data to show they are overabundant. Proposals 231 and 232 are similarly non-specific and unproved. To state, in the language of Proposal 232, “Moose hunters will benefit by the board creating an ecosystem capable of providing sustained yield of moose,” shows a tremendous amount of hubris. We do not support the **“creation of ecosystems”** by the Board of Game. In our view, the Board may be called upon to solve discreet problems, but not to apply single-minded management in Game Management Unit 20C.

#### **Wolf Townships remain controversial**

In 2010 I appeared before you at the March Board of Game meeting and advocated for a no hunting/trapping zone for wolves in the Wolf Townships. I carried with me a petition signed by hundreds of Alaskans supporting some form of protection for wolves that venture out of Denali Park to the northeast into the Wolf Townships (after caribou, who go there also), and are easy prey for hunters and trappers there. Although the Board of Game has removed all wolf hunting/trapping limits in the Wolf Townships north of Denali, there is still a significant group of Alaskans who support the institution of such controls. Although we do not have a proposal for you at this time, we as a group and individually want you to know that we would be happy to work collaboratively toward real solutions for wildlife management in the Wolf Townships. We know that some of our members may not get exactly what they would like in a collaborative process, but we support such a process.

#### **Support Proposal 233 (authored by Jim Stratton)**

We support Proposal 233. It would make no wildlife management changes itself, but it does support the collaborative development of a Controlled Use Area Plan for those very Wolf Townships that have become so controversial over the years. This is why I urge that you approve Proposal 233.

We appreciate your work on behalf of all Alaskans,

Sincerely,

Nancy Bale  
DCC Board of Directors  
907-277-3825