

Denali Citizens Council



Advocating for Denali's Wilderness, Wildlife and Way of life.

December 3, 2014

Bert Frost
Regional Director
National Park Service
240 West 5th Ave.
Anchorage, AK 99501

Dear Mr. Frost,

On behalf of the Board and more than 300 members of the Denali Citizens Council, I am submitting this letter in support of the Draft Regulation RIN1024-AE21, which would prohibit certain types of hunting practices on the National Preserves. The Council has been active in the gateway communities of Denali National Park since 1974, and supports the ANILCA expansion and the creation of Denali's approximately 1.3 million acres of National Preserves. We also support the core mission of the National Park Service, to preserve naturally functioning ecosystems and the natural abundance of native wildlife populations.

We agree that the National Park Service has the authority, provided under the National Interest Lands Conservation Act, to manage hunting in the Preserves according to NPS wildlife management policies. In fact, we feel that NPS is absolutely compelled to limit hunting methods and means that are likely to affect the natural diversity of wildlife populations in the Preserves.

We agree that the Alaska Department of Fish and Game can lawfully regulate hunting in the Preserves, and has been so doing for decades, since the 1980 passage of ANILCA. However, since the passage of the State's Intensive Management Law by the Alaska Legislature in 1994, and especially since the early 2000s, the department and the Board of Game have emphasized "hunter opportunity" above all other values. This highly politicized management trend has spawned hunting regulations unreflective of science or fair chase hunting ethics. Although the Board of Game and officials in the Department of Fish and Game invoke the IM law in defense of enhanced predator hunting practices and increased use of predator control, we at DCC read the current situation as not sustainable over the long run. NPS must step in on its lands and use its authority to prevent such state regulations from being enforced.

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The Denali Citizens Council has signed on to comments submitted to you by Trustees for Alaska, entitled *Comments on National Park Service Proposed Rule for Hunting and Trapping in National Preserves in Alaska (Regulation Identifier Number 1024–AE21)* and we support the points of argument in the Trustees letter,

1. that the State of Alaska and the Alaska Board of Game have systematically increased hunting practices that target predators,
2. that NPS has the authority to regulate these practices on the Preserves,
3. that NPS authority on its lands is preemptive of state regulation, by law, and
4. that certain specific practices, recently authorized by the Alaska Board of Game, such as flashlighting black bear sows and cubs in their dens, taking grizzly bears over bait and hunting wolves during the denning season, should not be allowed on the Preserves.
5. We also support the process, identified in the regulation, of identifying conflicting state regulations annually, as a proactive strategy for managing hunting and trapping in the Preserves.
6. In addition, we agree with the Trustees letter that NPS should examine the practice of black bear baiting in the Preserves with an eye to banning this practice, as a public safety action.
7. We urge NPS to ban bear snaring as part of trapping regulations in the Preserves.
8. Finally, we suggest that NPS consider even further restriction of the wolf hunting season to prevent disruption of breeding pairs during the entire breeding season, which begins in March.

The Denali Citizens Council has been an active participant in public dialogue with the Alaska Board of Game regarding hunting and trapping in the Denali region. There are a few specific concerns that we have regarding ADF&G management in the Denali region.

A. Despite low wolf population densities in Game Management Unit 20C (known and documented in ADF&G scientific publications and acknowledged by Board member Nate Turner), the Board of Game, at its Interior Region meeting in February 2014, increased bag limits for wolves in Unit 20C from 5 to 10 wolves per year. When DCC brought up our concern regarding the increased bag limit, we were told that it probably would not result in increased take, a response that defies reason, unless it is designed only to give the impression of hunter opportunity.

B. Additionally, in Units 20C and 19C and 19D, adjacent to the northwest Denali Preserve, the Board of Game continues to support a long hunting season for wolves, from August 10th to May 31. Despite recent research that suggests the loss of breeding members of a wolf pack can lead to pack disruption, the Board of Game allows hunts during times when wolves are denning and pupping, and ADF&G biologists claim that there is no “population-level” concern for Denali wolves. Science-based precaution would suggest otherwise, and we hope that NPS, after this regulation is promulgated, will continue to examine the bag limits and season lengths for wolves to develop even more protective parameters.

C. Although Denali Preserves are accessible only by airplane or boat, non-hunters, including hikers, boaters, and climbers who wish to have a remote experience will choose to visit these areas. This makes bear baiting of any kind, not simply taking brown bears at

black bear bait stations, an inappropriate activity in the Preserves, as it tends to create food-conditioned bears in a wilderness recreation environment. We urge NPS to reconsider black bear baiting in Denali Preserves.

We support the full implementation of this regulation across Alaska, and feel that it provides no threat to the harvesting of wildlife by Alaska residents, guided hunters, and federally qualified subsistence users. We urge adoption of the Action Alternative (B) in the EA published along with the Draft Regulation.

We note that there is a new Governor of Alaska and a new Commissioner of the Department of Fish and Game and Director of the Division of Wildlife Conservation. We feel there is reason to believe that better coordination between the National Park Service and the State of Alaska is now possible. We regret that the comments on this regulatory process from the State of Alaska have not come to you from the current administration, and we urge you to contact and consult with the new administration as you prepare your responses to comments. There may be some areas for agreement that did not exist prior.

I attended the Walker-Mallott Transition Conference in mid-November 2014 and sat in on the deliberations of the Wildlife Committee. The committee members, selected for their knowledge and experience, made several recommendations to the new governor, including;

- There should be greater collaboration across agencies and federal-state entities
- Conservation, stewardship and public relations must be fostered, and the composition of the Board of Game should be more diverse.
- The state should work toward a way to resolve the federal-state dissension on subsistence preference.

These, among others, are hopeful signs, if the administration heeds them, for a new day of cooperation between the National Park Service and the State of Alaska. Meanwhile, know that supporters of your current action are numerous.

Sincerely,

/s/ Nancy Bale

DCC Board Member
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