

Denali Citizens Council



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

April 4, 2014

*PO Box 78,  
Denali Park AK 99755*

*www.denalicitizens.org*

*907-683-3396*

To: National Park Service, Alaska Regional Office  
240 W. 5th Avenue  
Anchorage, AK 99501

Cc: Don Striker, Superintendent, Denali National Park and Preserves

To Whom It May Concern:

On behalf of the board and over 300 members of the Denali Citizens Council (DCC), I am submitting comments on the 2014 temporary restrictions to the taking of wildlife in Denali National Preserves. DCC represents local, regional and national citizens with a particular interest in maintaining the natural integrity of Denali National Park and Preserve. Most of our members live and work in the communities surrounding the park, either seasonally or full time, or have visited Denali and gained an appreciation for its special character and scope. We appreciate the opportunity to comment on these proposed temporary restrictions to the taking of wildlife in Denali National Preserve.

DCC supports NPS' proposed closures to certain methods and means of taking predators in the Denali Preserves. To wit, we support NPS' prohibition of taking a black bear artificial light at a den site in the Preserve, we support NPS' prohibition on taking a black bear cub or a sow with a cub at a den site, we support NPS' prohibition of taking a brown bear at a bait station in the Preserve, and we support NPS' prohibition of taking wolves or coyotes from May 1 through August 9.

All of these practices have recently been allowed by State of Alaska hunting rules, when formerly they were prohibited. The State's new policies are aimed at managing wildlife for an abundance of prey species for hunters, which is inconsistent with the NPS Management Policies directive to "protect natural systems, processes, and wildlife populations, including the natural abundances, diversities, distributions, densities, age-class distributions, populations, habitats, genetics, and behaviors of wildlife."<sup>1</sup> It is also inconsistent with the purposes for Alaska parks expressed in section 101 of ANILCA, to "protect extensive, unaltered ecosystems in their natural state." These protected ecosystems include unaltered predator-prey relationships which could be disrupted through excessive take of predators by humans. The State's uncooperative disregard for the purposes of Denali and the management

---

<sup>1</sup> NPS Management Policies 2006 4.1, 4.4.1, 4.4.1.2, 4.4.2

*Board of Directors*

*Nancy Bale*

*Sarah Bartholow*

*Barbara Brease*

*Nan Eagleson*

*Charlie Loeb*

*Brian Napier*

*Michael Raffaeli*

*Hannah Ragland*

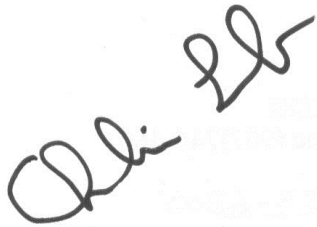
*Erica Watson*

priorities of NPS is inexplicable after decades of mutual accommodation since ANILCA created the Preserves in 1980. It is the State's actions that make it necessary for NPS to take the step of implementing these temporary regulations.

Because the State of Alaska appears unwilling exempt NPS-managed lands from its rule changes, temporary regulations will prove insufficient. We strongly support any NPS efforts to make these regulations permanent.

Thank you for standing up for the values of Denali.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Loeb", written in a cursive style.

Charlie Loeb  
President, Denali Citizens Council