

November 27, 2013

Honorable Sally Jewel, Secretary
U.S. Department of Interior

Honorable Sean Parnell, Governor
State of Alaska

RE: *Denali National Park* wildlife buffer conservation easement exchange or purchase between the State of Alaska and the United States.

Dear Secretary Jewell and Governor Parnell,

We, the undersigned, write to you today to respectfully ask that you negotiate an easement exchange or purchase to secure a permanent wildlife conservation buffer east of Alaska's Denali National Park. We propose a "win-win" exchange of property interests (e.g., easements) between the U.S. and State of Alaska, or an easement purchase by the U.S., to maximize long-term public benefit.

As you know, the viewing opportunities for some Denali National Park wildlife populations, notably wolves, have declined substantially in recent years, due in part to take on state lands east of the park. In 2010 (the year in which the state removed the no-take wolf buffer east of the park), wolf-viewing success for the park's 400,000 visitors was estimated by NPS staff at 44%, declining to 21% in 2011, and then to 12% in 2012. The 2013 wolf-sighting result, just released by Denali National Park, reflects a further decline, down to just 4%.

As far as we know, **this precipitous decline in wildlife viewing success is unprecedented in the history of the national park system.** This alarming decline threatens the viability of Denali's world-class, multi-million dollar wildlife viewing economy, and it is clearly in the public interest to reverse this decline.

The easement exchange we propose below is for the State of Alaska to transfer a wildlife conservation easement east of the park (see attached map) to the federal government – a no-take buffer - in exchange for the federal government transferring an equal-valued federal property easement, or purchase value, to the state. This will clearly help to reverse the decline in wildlife viewing success, and will help to sustain and grow the tourism economy of Denali National Park, and Alaska.

The unique aspect of our proposal is that we are not simply asking the state to grant a Denali wildlife buffer easement that, although certainly in the state's economic interest, the state has recently been unwilling to grant. Instead, we are proposing that the state grant the permanent conservation easement, and receive an equal-valued federal asset, or purchase value, in exchange – thus, a "win-win" deal, in the interest of both parties. We have not identified specific federal assets to consider for exchange, but discuss some possibilities for your consideration.

We respectfully ask that you set aside current political differences between the State of Alaska and the U.S., get creative, and agree to establish a permanent buffer to sustain and grow Denali's important wildlife tourism economy.

Background

Along with Yellowstone National Park, Denali National Park is known as one of the best places in the world to view wolves in the wild. Over 400,000 visitors come to Denali each summer, many citing their desire to see wolves as one of the main wildlife viewing objectives for visiting the park. More than anywhere else in Alaska, wolves in the eastern part of Denali provide significant benefits to Alaska tourism. Denali visitors contribute millions of dollars each year to the state economy (see NPCA discussion below). Wolf viewing opportunities have historically been provided by three packs that den and range near the park road – Grant Creek, Nenana Canyon, and East Fork packs. These three family groups have been severely disrupted by trapping and hunting on state lands east of the park boundary.

In recognition of the exceptional economic value of wolf viewing in Denali, from 2000-2010 the state had closed lands adjacent to the park's eastern boundary to the taking of wolves to protect wolf-viewing opportunities in the park. Together, the *Stampede Closed Area* and the *Nenana Canyon Closed Area* covered approximately 122 square miles of important wolf habitat. The closed areas had negligible effect on the few wolf trappers and hunters who had operated in the area, as adjacent areas remained open to their activities.

But it was clear that even the former state buffer did not adequately protect Denali National Park wolves. Analysis of data from NPS radio collars showed that two of three most commonly viewed wolf packs in the park travel into areas east of the buffer, where they remained vulnerable to trapping and hunting. State records indicated that, even with the buffer in place, there was an upward trend in the numbers of park wolves taken, and in some years, a significant percentage of the total park wolf population was taken east of the park. And as the science has established, it's not just about numbers of wolves taken. The loss of family group integrity and unique behaviors due to take east of Denali has been dramatic.

At its spring 2010 meeting, the Alaska Board of Game eliminated the former Denali buffer altogether. Despite several public proposals to the Board to *expand* the existing buffer (as it was clearly insufficient to provide adequate protection to park wolves), including a proposal from Denali National Park itself, as well as overwhelming public support for retaining and expanding the buffer, the Board not only denied all buffer expansion proposals, but voted to eliminate the existing buffer altogether. At the same time, the Board established a moratorium on future consideration of Denali buffer proposals from the public for at least 6 years.

Subsequently, several civil society interests in Alaska (including some signatories to this letter) proposed that the Board of Game and/or the Alaska Department of Fish

and Game reestablish a Denali buffer, but all such requests were declined. At the time, citizen petitioners predicted that the continued exposure of Denali wolves to take across the eastern boundary would result in a further drop in the park wolf population and visitor viewing success - **precisely what we now know has occurred**. It is apparent, and unfortunate, that current wildlife management authorities in the State of Alaska do not consider sustainability of wildlife viewing at Denali a management goal. But as we have learned, even if one state administration were to establish a buffer, a subsequent administration may remove such. Thus we feel there is clear need for a permanent buffer to sustain and grow the Denali wildlife viewing economy.

Today, the wolf population across the 6 million acre park and preserve has declined from 143 wolves in fall 2007 to just 55 in spring 2013 – a drop of more than half in six years. And, just since the state removed the buffer in 2010, wolf-viewing success for the park’s 400,000 annual visitors has dropped precipitously from 44% in 2010 to just 4% in 2013. This is truly alarming, and again, as far as we are aware, unprecedented in the history of the national park system.

Another way to look at this data is that in 2010, 180,000 visitors - from Alaska, across the nation, and the world – were fortunate to view wolves in Denali. But in 2013, only 16,000 observed wolves in the park. Thus, tens of thousands of paying visitors were denied the opportunity to watch Alaska wolves in the wild in 2013. This unprecedented decline in wildlife viewing opportunities has seriously eroded the natural amenity of the park, and more broadly, Alaska. If this trend continues, a reduction in future tourism dollars in the Denali area, and Alaska, may result. We feel this should be avoided.

Some have suggested that there may be natural causes contributing to this decline, although we are aware of no science to support this assertion. To the contrary, DNP wildlife biologists have reported that prey populations are generally healthy in the park, and thus the wolf population decline is likely not caused by lack of prey (DNP wildlife biologist Tom Meier, personal communication, August, 2012).

Because wolves that frequent the park road area are accustomed to a benign presence of humans, they are particularly vulnerable to harvest. Even older, breeding wolves are more susceptible to being trapped or shot because of this. Trapping and hunting of park wolves, particularly breeding individuals, has clearly decreased park wolf numbers, altered behavior and distribution, and significantly decreased opportunities for wolf viewing by park visitors.

This is precisely what resulted from the take of the Grant Creek female in spring 2012, when the last breeding female of the Grant Creek family group - one of the most often viewed packs in the park - was taken in a snare in the former buffer area. Her loss resulted in the 15-member pack not having any pups that year, abandoning the historic den site near the park road, and dispersing. Thus, as a result of the loss of this one critical individual, visitor wolf-viewing success in Denali declined by

almost 50% that year alone, costing thousands of park visitors a chance to watch wolves in the wild.

It is clear that the **continued take of park wolves outside the park, particularly breeding adults, continues to contribute to the reduced wolf population and visitor viewing success in the park. This is simply inarguable.** And while we can't do much about natural causes of such a decline (if there are such), we can and must eliminate the human-caused contribution – that is, trapping and hunting take along the park boundary. Without an adequate no-take buffer along the eastern boundary of the park, it is likely that the park wolf population and viewing opportunities will remain at very low levels, thereby foreclosing a significant economic opportunity for Alaska.

Another deleterious effect of continued snaring/trapping on state lands bordering the park is the presence of wolves with broken snares or traps in areas where they are seen by large numbers of visitors to the park. Wolves have been photographed wearing broken snares, and have been seen on the park road carrying a trap on their paw. Even a three-legged grizzly bear, evidently having lost its leg in a snare or trap east of the park, has been seen and photographed in the area. Such sightings by visitors have a detrimental effect on public opinion regarding Alaska's wildlife management system, and erode the natural amenity of the national park.

A permanent wildlife buffer on lands east of the national park, as we propose herein, is essential to reverse this decline, and to sustain and grow the wildlife viewing economy of the park.

Economic Value of Denali Wolves

In a June 6, 2012 letter to Governor Parnell, the *National Parks Conservation Association* (NPCA) expressed the following endorsement of a wolf buffer at Denali:

We ask you to consider that the cost to Alaska's reputation as a visitor destination is not worth the negative press generated when Denali Park wolves are trapped beyond park boundaries. It seems logical to us that the state, recognizing the importance of charismatic watchable wildlife to local businesses, would see the benefit of providing a buffer for Denali's wolves. Without a buffer, trappers will continue to harvest park wolves and the resulting negative press for Alaska will no doubt negatively affect the visitor industry, as it did during the tourism boycott caused by the state's aerial wolf control program in 2004. From a strictly economic valuation, Denali's wolves are worth far more alive than dead and that should resonate with you.

Tourist dollars are a significant boost to this state's economy. And most of those visitors list viewing wildlife as one of the main reasons they come to Alaska. The latest economic figures for the visitor industry come from the McDowell group's March 2010 "Economic Impact of Alaska's Visitor Industry," which estimates a

\$1.5 billion in-state visitor impact. And we do not see this as a full spending estimate because that number does NOT include spending getting to and from Alaska (like airline or cruise ship tickets). According to research by Michigan State University, conservative estimates put the impact of Alaska's National Parks at \$208 million in direct visitor spending with Denali providing almost 75% of that amount (\$141 million). Alaska has what the Lower 48 does not – intact functioning ecosystems. And intact ecosystems are what visitors come to see. In Yellowstone, for example, wolf viewing has turned into a multi-million dollar industry as people come from all over the world to view wolves that had to be reintroduced to that environment. We are fortunate in Alaska in that our wolf populations are generally healthy and that's one of the reasons people come to visit.

(NPCA letter to Governor Parnell, June 6, 2012)

State–Federal wildlife management relationship

You are both aware of the long history and political context of this controversy. We recognize the unfortunate enmity between the State of Alaska and the U.S. regarding land and wildlife management issues. But it is our respectful suggestion that it is in the clear interest of the State of Alaska and the U.S to set this animosity aside in this case, and negotiate a permanent resolution to the Denali wildlife situation.

The State of Alaska has a long-standing *Memorandum of Understanding* (MOU) to work cooperatively with the federal government on wildlife issues. It was in this cooperative spirit that the state closed the former buffer to wolf take along the eastern boundary of Denali, a closure that stood until 2010. As well, the state has appropriately protected the Denali caribou herd from harvest on state lands since the mid-1970s, in a cooperative effort to assist in the recovery of this herd. And, the National Park Service has continued to allow subsistence and sport take of wolves on the 1980 additions to Denali National Park and Preserve - a policy we feel should be re-evaluated given the steep decline in the park's wolf population and viewing success. Additionally, much of the funding for Alaska's wildlife management division comes directly from DOI, through the federal Pittman-Robertson Act. Clearly, the state and federal government can and do work cooperatively on issues of mutual interest.

One of the mandates of Denali National Park is to maintain natural, healthy wildlife populations, undisturbed by human activities. Denali is designated by the United Nations as a Biosphere Reserve under its Man and Biosphere program, important for subarctic ecosystem research. In its statement of purpose, the park stated:

Denali's rich legislative and administrative history affords a very special opportunity to the public: the possibility of observing free-roaming wildlife at close range and spectacular, world-class scenery in a rugged wilderness setting. Opportunities for this experience are rare in other regions of the country and the level of access is unusual for Alaska.

Unfortunately, the current allowance of wolf take on state lands just outside the park significantly compromises the park's ability to meet these mandates, to the long-term detriment of all Alaskans and Americans.

The Solution -- a federal-state easement exchange or purchase

Thus, we propose that you negotiate a “win-win” deal, in which the State of Alaska transfers to the U.S. Department of Interior a permanent no-take wildlife (particularly wolf) buffer conservation easement east of the national park (as generally identified in the attached map), in exchange for the federal government transferring a like-valued property asset, or purchase value, to the State of Alaska.

Even with the contentious relationship between the State of Alaska and the federal government, there is precedent for such a deal. For instance, in 2006, during the Murkowski-Bush administrations, a similar, mutually agreed exchange of property interests was finalized -- the Falls Creek Land Exchange, where Glacier Bay National Park transferred lands to the State of Alaska (for a hydroelectric project near Gustavus), in exchange for the state transferring lands along the Chilkoot Trail to the National Park Service. And, during the Hickel-Clinton, Knowles-Clinton, Palin-Bush administrations, many such land/habitat protection deals were accomplished with *Exxon Valdez Oil Spill* restoration funds, providing a lasting, positive legacy from the 1989 oil spill tragedy.

Our point here is that even with current public animosities between the State of Alaska and the federal government on such issues, a mutually beneficial deal on to sustain and grow Denali's wildlife viewing economy is possible. We realize there exist strong sentiments in current state wildlife management authorities to *reduce* predator populations, but in places such as Denali, it is clearly in the state's economic interest to *sustain* watchable predator populations for wildlife tourism. Put simply, **Denali wolves and other wildlife are worth far more alive than dead.**

While we do not suggest a specific federal property asset to exchange, there are many possibilities to explore. One possibility would be for DOI to convey an easement on the portion of the Tokositna River that runs on the south side of Denali National Park, along the boundary with Denali State Park. Such an easement could provide recreational opportunities to state residents and visitors, particularly given the state's development of the South Denali Visitor Center. As well, there are many other possibilities of federal property assets that could be considered for exchange with the State of Alaska for the Denali wildlife buffer easement, including extensive properties currently managed by the Bureau of Land Management (BLM), or by the Department of Defense (DoD) in Alaska, such as Fort Greely or Joint Base Elmendorf-Richardson (JBER).

We are confident that the U.S. and the State of Alaska can identify suitable assets to potentially trade for the Denali wildlife conservation easement, or agree to a

straightforward easement purchase by the federal government, and we respectfully ask that you immediately embark on a process to identify such opportunities. We understand that a *Fair Market Value* appraisal of the assets considered for transfer or purchase would need to be conducted, and that a deal may need to go through a *National Environmental Policy Act* (NEPA) process, and may need to be approved by the U.S. Congress and the Alaska Legislature. We are convinced that the mechanics of this deal can be easily accommodated, if the state and federal administrations agree to the deal.

It is clear that most Alaska and American citizens would support such a deal, and we are confident that the Alaska tourism industry will benefit from, and support, such a pro-tourism deal as well. Thus we urge that you move expeditiously to negotiate and close this deal as soon as possible.

And as a final agreement on this may take some time, we ask that the State of Alaska demonstrate good faith by immediately imposing a **temporary emergency closure of the buffer area** to protect the resource values subject to a potential deal, until a final agreement can be reached and implemented. Just this fall, 4 of the 7 members of the Nenana Canyon wolf family group were killed east of the park. This take and consequent decline will likely continue throughout the winter hunting/trapping season, unless the state imposes a temporary buffer as requested.

Finally, we are aware that these boundary management issues exist around many national parks across the nation (e.g. Yellowstone, Grand Teton, etc.), thus we propose that DOI establish a *National Parks Boundaries Management Working Group* to explore options for resolving these state-federal issues nationwide. States benefit enormously from their national parks, and it seems time to begin a more rational and constructive relationship between states and DOI on these boundary management issues. Our proposed buffer conservation easement exchange or purchase may be useful at resolving such issues at other national parks as well.

We look forward to working with you toward this win-win goal for the tourism economy of Denali National Park, and Alaska.

Sincerely,

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Barbara Brease, Healy
Marybeth Holleman, Anchorage
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cc. Alaska Tourism Industry Association