July 29, 2016

Dear Dr. Richard Steiner,

This letter is in response to your inquiry about wolf packs and populations in Yukon-Charley Rivers National Preserve (YUCH), and the effects on wolves resulting from State of Alaska intensive management activities conducted on (State) lands near YUCH. I have included your original questions below, along with responses compiled by the Preserve’s natural resource staff.

**Question:** “The number of wolves using Yukon-Charley that the state has killed outside the boundary of the Preserve?”

**Response:** Since the Alaska Department of Fish and Game (ADFG) initiated the current intensive management program of culling wolves in 2005, the National Park Service (NPS) is aware of 90 wolves killed that were members of packs with home ranges within YUCH.

**Question:** “The number of Yukon-Charley wolf packs that have been affected by the state intensive management effort, and to what extent?”

**Response:** We know of nine wolf packs monitored by the NPS that have been impacted by ADFG’s intensive management activities. To the best of our knowledge, the extent is as follows:

- **Threefinger Pack:** 2005 – Six wolves shot (two research-collared animals) by ADFG-authorized private airplane hunters. Pack reduced to three wolves.
- **Cottonwood Pack:** 2005 – Nine wolves shot (two research-collared animals) by ADFG-authorized private airplane hunters. Pack reduced to five wolves.
- **Webber Creek Pack:** 2010 – Four wolves shot (two research-collared animals) by ADFG employees (via helicopter). Wolf pack eliminated.
- **Copper Mountain Pack:** 2010 – One wolf shot (a research-collared animal) by ADFG-authorized private airplane hunters. Pack reduced to two wolves.
- **Copper Mountain Pack:** 2011 – One wolf shot (a research-collared animal) by ADFG-authorized private airplane hunters. Pack reduced to one wolf.
- **Lost Creek Pack:** 2012 – Eight wolves shot (no research-collared animals) by ADFG employees (via helicopter). Pack reduced to four wolves.
- **Seventymile Pack:** 2013 – Twenty-four wolves shot (two research-collared animals) by ADFG-authorized private airplane hunters. Pack eliminated.
- **Woodchopper Pack:** 2013 – Four wolves shot (no research-collared animals) by ADFG employees (via helicopter). Pack reduced to one wolf.
• Yukon Fork Pack: 2013 – Eight wolves shot (one research-collared animal) by ADFG employees (via helicopter). Pack reduced to one wolf.
• Lost Creek Pack: 2014 – Eleven wolves shot (two research-collared animals) by ADFG employees (via helicopter). Pack eliminated.

Question: “The number of wolves killed in the intensive management effort that had been fitted with NPS radio collars for NPS research?”

Response: Thirteen wolves wearing NPS research collars have been killed as a result of ADFG’s intensive management program.

Question: “The impact of the state’s IM program on the NPS research program in the Preserve”?

Response: The shooting of wolves collared for research has negatively impacted the NPS wolf science and monitoring program. The loss of collared wolves has reduced our ability to locate packs, observe dens, and conduct spring and fall population estimates. The accumulated effect of losing collared wolves contributed to a NPS decision to suspend our long running radio-telemetry program.

Question: “The extent to which the IM effort has succeeded in boosting the Forymile Caribou Herd (FCH) -- the state’s primary justification for the IM effort in the area?”

Response: The NPS is not directly involved in research or monitoring of the Forymile Caribou Herd (FCH). The current size of the FCH is not known since there has not been a successful photo census of the FCH since 2010. However, ADFG data suggests that Fortymile caribou calf survival has not increased in the past five years. No data are available regarding changes in adult Fortymile caribou survival.

Question: “The overall population of wolves in the Preserve since 2005, and whether such has remained within limits of natural variability, etc?”

Response: ADFG’s intensive management program on State lands near YUCH has impacted the Preserve’s overall wolf population, changing it from a self-sustaining population to one reliant on immigration of wolves from outside the area. We know of wolves that have recolonized some pack home ranges left vacant from the State’s predator control program, but we do not know the extent to which that has occurred.

Question: “The overall impact of the state intensive management program on the purposes of the Preserve, which we understand include preserving unaltered ecosystems, natural predator-prey dynamics, natural processes, and long-term scientific research?”

Response: ADFG’s intensive management program has reduced wolf populations in the area of the Preserve, and has negatively impacted nine wolf packs with home ranges within YUCH. Yukon-Charley Rivers National Preserve was established by Congress in part to protect habitat and populations of wildlife – including wolves and caribou – and to maintain the integrity and natural condition of the Charley River basin. Due to intensive management, the wolf population in YUCH is no longer in a natural state. If there is linkage between predator control and growth in the FMC, the caribou population may no longer be considered in a natural state in the Preserve either. NPS has ceased rigorous monitoring of YUCH
wolves largely in part to the State’s intensive management program. The expense of collaring and monitoring wolves for research is not sustainable when ADFG culls the same animals when located outside of the Preserve.

**Question:** “The relative impact of subsistence and sport take of wolves in the Preserve vs. the state’s intensive management take?”

**Response:** Conventional harvest of wolves (combining both sport and subsistence harvest numbers) in YUCH has always been small, averaging about six wolves per year for the past 31 years. This average is based on ADFG’s sealing records for wolves. That average has dropped to 1.8 in the Preserve over the past five years, likely due to intensive management activities in the outlying area.

**Question:** “Management options that are available to NPS with which to restore natural processes (and other purposes) of the Preserve?”

**Response:** There are few options available to the NPS to respond to ADFG’s intensive management of wolves on State lands near YUCH. The NPS does have the authority to implement restrictions on sport and subsistence harvest of wolves within the Preserve. In the recent past, a temporary sport hunting and trapping closure was implemented by the NPS, however, as described earlier, the conventional harvest of wolves is small, averaging only 1.8 wolves per year now. Closing the harvest had a negligible effect on the overall wolf population in the Preserve and demonstrated that such closures would have little effect until intensive management activities have stopped.

**Question:** “Any relevant communications between the Preserve and the state re: concerns about this issue?”

**Response:** The NPS continues to reach out to ADFG and other affected parties, hoping to identify and advance shared conservation goals to avoid adverse impacts on wildlife resources within YUCH. We are encouraged by the interest and engagement on this and other topics demonstrated by Darren Bruning, Regional Supervisor for Region III of ADFG, here in Fairbanks.

Dr. Steiner, thank you again for your inquiries. I trust these responses help to answer your questions. Should you have additional questions or comments, please do write to me again. My address can be found in the letterhead above. My email address is greg_dudgeon@nps.gov. My office telephone number is (907) 455-0614.

Sincerely,

Greg Dudgeon