

Petition Requesting Alaska Board of Game to Adopt Emergency Regulation Closing State Lands to Taking of Wolves Along the Eastern Boundary of Denali National Park (GMU 20)

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I. Introduction

This petition is filed pursuant to AS 44.62.220, requesting the Alaska Board of Game to establish an Emergency Regulation closing state lands identified below in Game Management Unit (GMU) 20 along the eastern boundary of Denali National Park to the taking of wolves.

The petitioners respectfully request that the Board meet and act affirmatively on this petition as soon as possible, in advance of the scheduled opening of the wolf trapping season in the area Nov. 1, 2012.

State policy expressed in AS 44.62.270 makes clear that “an emergency is an unforeseen, unexpected event that...threatens a fish or game resource.”

The expressed standards are that there exists a threat to a game resource, and that this threat was unexpected and unforeseen. Both clearly exist in this case. New information became available just last month (from summer 2012 observations by

National Park Service biologists), that the take of wolves on state lands adjacent to Denali National Park has caused significant, deleterious impacts to park wolves - an Alaska game resource - and this impact was unexpected and unforeseen. The threatened resource in this case is the economically important wildlife viewing resource of wolves in eastern Denali National Park and Preserve. If the threat to Denali wolf viewing is not immediately mitigated by Board action requested herein, there could be additional long-lasting impacts and lost value of the resource, to the detriment of the Alaska economy. Thus, a resource emergency clearly exists in this case, requiring action by the Board.

To be clear, the petition does not suggest that there exists a threat to the wolf populations across the entirety of GMU 20, nor does it propose protecting such. The petition proposes simply that a small subset of the GMU 20 wolf population - the twenty to thirty animals that comprise the three most viewed wolf packs in Denali National Park - is at significant risk from take on adjacent state lands, and it asks the State to grant protection to this small, unique subset of the GMU wolf population, due to its significant, and disproportionate, economic value to Alaska.

We now know (personal communication with Denali National Park staff, July and August, 2012) that the snaring of the one breeding female wolf from the Grant Creek pack - the most often viewed wolf pack in Denali National Park - on state lands just outside the park boundary in April 2012, resulted in the following significant and unforeseen impacts:

1. The Grant Creek pack had no pups this year. The snared female, which had been observed nursing pups last year, was evidently the only remaining breeding female in the pack (another breeding female from the pack was found dead due to natural causes this spring). Thus, her loss resulted in no reproduction at all for the pack this year;
2. With no pups to attend and care for, the pack abandoned its historic den site (the Murie den), which was close to the park road and had provided increased opportunity for viewing by park visitors. The pack temporarily occupied the den site for a few weeks in May and June, but with no pups to keep them there, they abandoned the site in July.
3. Some members of the Grant Creek pack have dispersed south of the Alaska Range, and the pack seems to have lost much of its former social cohesion. The long-term fate of the pack is unknown at this time, but it may have disintegrated permanently.
4. Visitor viewing of wolves in Denali National Park was significantly decreased in summer 2012 compared to previous years, due in part to the above three impacts of the take on state lands just outside the park boundary. This reduced visitor experience may result in direct economic loss to Alaska in future years.

It is clear that the snaring of this one female wolf on state lands just outside the park this spring contributed to a significant, unexpected disruption to the integrity of the Grant Creek pack, and a significant loss of valuable tourism opportunity, including for many Alaskans. Further, this trapping take and impact on Denali National Park resources received national media attention, resulting in significant damage to the reputation to the State of Alaska's commitment to sustainable wildlife management, and to Alaska's reputation as a wildlife tourism destination.

Importantly, additional take of park wolves on state lands along the park boundary could cause similar, or even more severe, deleterious impacts to this valuable wildlife and economic resource. Thus, the Board is respectfully requested to close state lands identified below to taking of wolves in order to prevent additional deleterious impacts to this valuable economic resource.

II. Background

Along with Yellowstone National Park in Wyoming, 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, and thousands of visitors see wolves along the Denali Park Road. Many visitors cite 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 tourism. Denali visitors contribute millions of dollars each year to the state economy (see discussion below). Wolf viewing opportunities are mostly provided by three packs of wolves that live near the park road – Grant Creek, Nenana Canyon, and East Fork packs.

In recognition of this economic value, 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 in GMU 20A and 20C. The former closed areas had little effect on the two or three trappers who had operated in the area before, as all other nearby areas remained open to wolf take. In the 2011/2012 season, there were only two trappers operating in the area, only one of whom lives in the area.

Further, even these closed areas did not adequately protect park wolves. Analysis of data from NPS GPS radio collars showed that two of three most commonly viewed wolf packs in the park travel into areas east of the Stampede Closed Area, where they remained vulnerable to harvest. ADF&G sealing records from UCU 605 and 607 of GMU 20C indicated an upward trend in the numbers of wolves harvested in this area, with as many as 12 wolves taken in 2007. The most recent wolf survey results in Denali National Park (Spring 2012) estimate a total population of 70 animals, in 9 packs. This is one of the lowest counts in the past 20 years. Denali National Park biologists report that prey populations are generally healthy in the park, and thus

the low wolf population is likely not caused by lack of prey (DNP wildlife biologist Tom Meier, personal communication, August, 2012). It is logical that the continued take of park wolves outside the park -- particularly of breeding females, such as the Grant Creek female this past spring -- may contribute to the reduced wolf population in the park.

Because wolves that frequent the park road 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. Harvest of wolves, particularly breeding wolves, has the potential to decrease wolf numbers, alter wolf behavior, and decrease opportunities for wolf viewing by park visitors. Such harvest may have a negligible effect on larger-scale wolf populations in the park, but can have significant, multi-year effects on visitor experiences. This is precisely what resulted from the take of the Grant Creek female this past spring, and will continue unless the area is closed by the emergency order requested herein.

Another 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. In winter 2007-2008, two wolves were photographed wearing broken snares. Another wolf was seen on the park road carrying a trap on its foot the previous year. Even a three-legged bear, evidently having lost its leg in a snare or trap, has been seen in the park. Such sightings by visitors have a detrimental effect on public opinion of trapping and Alaska wildlife management in general.

Finally, wolf captures in and near Denali National Park in recent years have shown a high incidence of wolves with lice just north of the park, but no evidence of lice from wolves living deeper within the park boundaries. Protection of park wolf packs from harvest promotes a pattern of movement of dispersing wolves out of the park and not into it, helping to ensure that the park is a reservoir of uninfected wolves. The loss of reproduction from the Grant Creek pack this year may encourage immigration of lice-infested wolves into the park, and reduce dispersal of non-infected wolves out of the park.

Stampede and Nenana Canyon Closed Areas Eliminated in 2010

At its Spring 2010 meeting, the Board eliminated the former Stampede Closed Area and Nenana Canyon Closed Area ("Denali buffer"). Despite several public proposals to the Board to expand the existing buffer, including from Denali National Park itself, as well as overwhelming public support for expanding the existing buffer, the Board not only denied all buffer expansion proposals, but also voted 4-3 to eliminate the existing closed areas altogether. A tie-breaking vote to eliminate the buffer was cast by an appointee, owner of a fur tannery in Fairbanks, whose appointment to the Board was not confirmed by the Alaska Legislature in its 2011 session. At the same time, the Board established a moratorium on future consideration of Denali buffer proposals from the public for 8-10 years.

MOU between State of Alaska and U.S.

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 areas to wolf take along the eastern boundary of Denali, which stood until 2010. As well, the state has protected the Denali National Park 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 Park Service has continued to allow subsistence and sport harvest of wolves on the 1980 additions to Denali National Park and Preserve.

The mandates of the National Park Service are to maintain natural and healthy wildlife populations of Denali National Park. The current allowance of wolf take on state lands just outside the national park is compromising the park's ability to meet its mandate, to the detriment of the state economy. Petitioners would emphasize that this should not be viewed as a state vs. federal issue, but rather an issue of sound wildlife management. The sound wildlife management option is to adopt the Emergency Rule specified below.

III. Economic Value of the Denali Wolf Resource

In a June 6, 2012 letter to Governor Parnell, the National Parks Conservation Association relayed the following in its endorsement of an Emergency Order as requested herein:

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 ltr. to Governor Parnell, June 6, 2012)

IV. Board of Game denial of September 6, 2012 Petition

As the Board will recall, on September 19, 2012 it denied a petition requesting this ruling submitted on September 6, 2012. The petitioners feel this decision was in error for a number of reasons:

1. The Board made substantive errors in its restrictive interpretation of the criteria for adoption of emergency regulation in state statute and regulation, as erroneously instructed by ADFG;
2. There is significant new information on the dramatic decline in viewing success of Denali wolves, and its economic consequences, presented herein;
3. There were significant inaccuracies in the Board’s understanding of the status of Denali wolves;
4. The Board did not uphold the Alaska Constitutional requirement (Article VIII) for protecting the greater “public interest” in managing wildlife resources; and
5. The Board’s decision was arbitrary and capricious, as the Board’s superficial and cursory deliberation of the public petition did not exhibit due diligence or comply with applicable law.

Details on each of the 5 issues are discussed below.

IV.1. The Board made substantive errors in its interpretation of the criteria for adoption of emergency regulation in state statute and regulation, as erroneously instructed by ADFG.

The Alaska Department of Fish and Game (ADFG) and the Board of Game (Board) have misinterpreted the criteria for adoption of emergency regulation as authorized by Alaska Statute 44.62.250, and implemented by 5 AAC 96.625 (f).

It is clear from earlier communication with ADFG, as well as from subsequent comments by ADFG staff and Board members to the media, that the agency's interpretation of the emergency standard required by the regulation is that there must exist a "biological emergency" for a wildlife "population."

The conventional ADFG misinterpretation of the requirement of the emergency regulation policy was evident in its May 29, 2012 denial of a May 18, 2012 request from one of the petitioners, as a result of the loss of the last breeding female in the Grant Creek pack, asking the Commissioner to use her emergency authority to reestablish the Denali wolf buffer, as follows:

From a biological perspective, the elimination of the buffers has not resulted in any sustainability concerns for wolves within the Game Management Unit 20, where the buffers were located. As such, the issue of the buffers around Denali National Park was and remains a social issue, and not a sustainability issue....As a result, the Department will not issue an emergency order closing these areas to further wolf take.

(5/29/12 email from Doug Vincent-Lang to Rick Steiner)

However, this purported requirement for emergency order – concern for the sustainability of wildlife over an entire Game Management Unit (GMU) - is not contained anywhere either in the statute or the regulation. As such, this is a contrived and arbitrary restriction on the authority of the agency and/or the Board to adopt the requested emergency regulation. Additionally, the state's logic cited above ignores the fact that there were demonstrable biological impacts to the entire Grant Creek pack caused by the trapping loss outside of Denali (e.g., a complete reproductive failure for the pack, altered distribution, disintegration, etc.) that clearly go beyond being "a social issue" as suggested, but manifest on a more localized scale (pack / family group) than an entire population or an entire GMU.

On the scale issue, it should be noted that GMU 20 covers a vast area of interior Alaska, approximately 35,000 square miles (about the size of the State of Maine), stretching from the Nowitna National Wildlife Refuge in the west all the way to the Canadian border in the east, and from north of the Yukon River south to Cantwell. As well, it covers many distinct ecological zones, and vast uninhabited areas, small communities, and the state's second largest city – Fairbanks. To manage solely for "sustainability concerns for wolves within the Game Management Unit 20" can obviously miss many serious, but more localized, resource emergencies, for which the emergency regulation is appropriate and necessary. Clearly, this is an inappropriate standard, and contrary to both the letter and intent of the emergency regulation.

As recited in the 9/19/12 denial from the State of Alaska:

Under the Joint Board Petition Policy, (5 AAC 96.625 (f)), an emergency is defined as “an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a biologically allowable harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future.

The portion of this definition relevant to the 9/6/12 petition, as cited on page one, is that the standard for a resource emergency requiring emergency regulation in this case is as follows:

...an unforeseen, unexpected event that...threatens a fish or game resource...

The petition does not assert that there is a “sustainability concern” or a “biological emergency” for the entire GMU 20 or statewide wolf population, which is the state’s misinterpretation of the requirement for emergency regulation.

Rather, the petition makes clear that the “**game resource**” in this case is Denali National Park (DNP) wolf packs / family groups, and the economic value they provide for visitor viewing. The petition argues that viewing of functionally intact DNP wolf family groups is, in and of itself, an Alaska game resource. This is clearly within the scope of the criteria for emergency regulation.

The “**unforeseen, unexpected event**” in this case is the dramatic breakup of the Grant Creek pack due to the trapping of the last breeding female in the pack on state lands in April (causing the pack to not produce pups, abandon its historic den, and disperse), and the subsequent decline in visitor viewing success this past summer. Again, this is clearly within the scope of the criteria for emergency regulation.

The “**threat**” in this case is equally clear – that continued exposure of Denali wolves to trapping and hunting in this narrow area of state lands just east of the park boundary will almost certainly continue to degrade the valuable DNP wolf viewing resource. And again, this is clearly within the scope of the criteria for emergency regulation.

Thus, contrary to the Board decision, indeed **all criteria necessary for finding of a resource emergency requiring emergency regulation are clearly met by the petition.**

The state’s emergency regulation is silent on what constitutes a “game resource,” silent on what constitutes a “threat,” and silent on what constitutes an “unforeseen, unexpected event.” Historically these matters been misinterpreted by various ADFG administrators and the Board to require the existence of a “**biological emergency**” affecting an entire “**population.**” This is a common misconception about the emergency regulation. **No such language or requirement exists in**

statute or regulation. Indeed, there is considerable debate within wildlife science about the very definition of the terms “biological emergency” and “population.”

Further, while the Board’s denial asserted that the situation described in the petition did not meet the criteria for adoption of emergency regulation, it did not discuss exactly *why not*, nor what, in its view, *would* be required to meet the criteria. In fact, using the state’s erroneous and restrictive interpretation of the regulation, all the wolves (or other wildlife resources) in Denali could be lost entirely, yet such a situation would still not, in the Department’s or Board’s view, constitute an event appropriate for emergency regulation because the regional population of wolves (or other wildlife) would not be significantly affected.

On this matter, ADFG’s direction to the Board on the petition was clearly in error, as it unreasonably restricted the Board’s interpretation of the regulatory language to mean only “biological emergency” that threatens an entire “population.” Again, this is not a requirement of the emergency petition regulation.

The statute and regulation clearly allow and require the Board and/or the Commissioner to enact emergency regulations to protect resources at scales smaller than entire populations or entire Game Management Units, and as well to protect resources for economic and social reasons, not strictly biological sustainability reasons.

Yet the Board was apparently not so instructed. Indeed, the Board was apparently led to believe that it was legally precluded by the regulation from finding in favor of the petition, when indeed it was not only *not* precluded from such a finding, it was clearly *authorized and encouraged* to reach such a finding.

Despite modern advances in wildlife science’s understanding of the important linkages between economic, social, and biological aspects of wildlife management, the State of Alaska continues to ignore this modern understanding. This is unfortunate, antiquated, contrary to the interest of the Alaska public, contrary to statute and regulation, and in need of correction.

IV.2. There exist significant new data on the dramatic decline in viewing success of Denali wolves, and its economic consequences, presented herein.

The petitioners also provide herein new preliminary data from the National Park Service, not available or included in the original 9/6/12 petition, as follows:

The National Park Service reports that viewing success of Denali wolves has declined from 45% in 2010, to 21% in 2011, to 14% in 2012. Thus, just since the Board of Game removed the buffer entirely in 2010, viewing success for wolves in the Park has declined by more than 60%.

If one projects this rate of decline forward into the future, the severity of threat to this valuable Alaska game resource becomes clear. Put simply, with the buffer in place, there was a reasonable chance of visitors to see wolves in the park. But without the buffer now, there is a high probability that visitors will see no wolves at all.

Further, this dramatic decline in wolf viewing success has already resulted in significant economic impacts, in that at least one national wildlife tourism organization announced that, due to the Board's denial of the petition, it has *canceled Denali tour plans for 2013, at an estimated loss of more than \$200,000 to the state economy.*

An official with one of tourism groups canceling their Denali tour plans next summer due to the Board's 9/19/12 denial of the petition wrote the following:

In these difficult economic times, it is hard to tell supporters to pay \$8500 for a trip to see wolves when we may not see them. At least if the buffer were in place, we can have assurance that all was reasonably done to ensure a chance at doing so.

Several Alaska businesses reliant on these tourism dollars would suffer due to the Board's previous decision.

IV.3. There were significant inaccuracies in the Board's understanding of the status of Denali wolves.

Despite the fact that the 9/6/12 petition included the most recent (Spring 2012) Denali National Park wolf survey, which documented 70 individual wolves in 9 packs, there seemed to be a lack of appreciation for this scientific data by the Board.

In the 9/19/12 article by the Associated Press, Board member Nick Yurko is quoted regarding the status of Denali park wolf packs as follows:

You have 19 different packs in the park.

Again, evidence was presented with the petition that there are just *nine packs* in the park. Thus, this media statement by a Board member suggests that either some Board members didn't read the petition and supporting data closely, didn't understand it, or chose to ignore it. Such a lack of appreciation of the actual status of DNP wolf packs, and their decline over the past few years, may easily have led to the erroneous conclusion by the Board that the break-up of the Grant Creek pack was less detrimental than it actually was.

IV.4. The Board did not satisfy the Alaska Constitutional requirement (Article VIII) for protecting the greater “public interest” in managing wildlife resources.

Article VIII of the Alaska Constitution – *Natural Resources* – stipulates that natural resources will be managed as a “public trust,” providing “for maximum use consistent with the public interest,” and for the “utilization, development, and conservation...for the maximum benefit of (the) people.”

The 9/6/12 petition clearly states the enormous value to *thousands of Alaskans* provided by the viewing of Denali National Park wolves. It should be obvious that the value and public interest to *thousands of Alaskans* provided by seeing Denali wolves, as well as the value to the many Alaskan businesses reliant on this tourism, should greatly outweigh the value and public interest of just *two individuals* being allowed to continue trapping Denali wolves outside the park boundary. Yet the Board entirely ignored this constitutional requirement to manage wildlife “for the maximum benefit of the people.”

IV.5. The Board’s decision was arbitrary and capricious, as the Board’s superficial and cursory deliberation of the public petition did not exhibit due diligence.

Finally, it is clear that the Board (and the Department) did not exercise due diligence in methodically considering the 9/6/12 petition submitted by Alaska citizens, and thus its decision was arbitrary and capricious. Simply stating that the petition does not meet their (inaccurate) interpretation of the regulatory requirement for emergency regulation by petition is clearly not sufficient. The 9/19/12 denial letter explains nothing whatsoever about the actual decision process employed by the Board. This decision is, by law, required to be a public process. Again, while the denial asserted that the situation described in the petition *did not* meet the criteria for adoption of emergency regulation, it did not explain *why* it did not, or what type of emergency *would* meet the criteria, as the Board decision clearly should have done.

Citizen petitioners of their government deserve a thorough, detailed assessment of the merits of the petition for emergency regulation, one that methodically weighs its potential benefits and costs. This is particularly true for the 9/6/12 petition, as it was respectfully submitted by organizations on behalf of *thousands of Alaska citizens*. Alaska citizens appropriate millions of dollars each year to manage *their* wildlife, and for this investment they expect and deserve more than such a casual and dismissive consideration of their petitions. It is abundantly clear that such a deliberate and public consideration of the petition was not afforded the petitioners in this instance.

V. Necessity of Petition for Emergency Rule

This petition process is necessary in this instance as the significance and disastrous consequences to Alaska wildlife resources caused by the take of individual animals (e.g., the Grant Creek breeding female) in the former Closed Area was clearly not anticipated by the Board when it eliminated the closure in 2010. Further, it is clear that additional take of park wolves that range onto state lands in this area this fall/winter could further compromise this valuable tourism resource for the state and nation, as well as further damage the State of Alaska's wildlife management reputation. **Importantly, the emergency petition process is necessary because the Board in 2010 imposed a long-term moratorium on further consideration of Denali buffer proposals through its normal proposal process.**

In May 2012, some of the petitioners asked the ADF&G Commissioner to issue this Emergency Order (under AS 16.050.060) closing state lands east of the park to taking of wolves. ADF&G denied the request, and stated that the only option to enact such a closure would be to petition the Board of Game directly.

VI. Emergency Rule Requested

This petition respectfully requests that the Board of Game adopt the following emergency rule:

Take of wolves is prohibited on state lands (GMU 20), in the area bounded on the west by the east boundary of Denali National Park; extending east to one mile east of, and parallel to, the Anchorage-Fairbanks Intertie Electrical Power Line; on the south by Carlo Creek; and on the north by a line from the southeast corner of Township 11S, Range 9W (Latitude 63 degrees, 55 minutes North), due east to the George Parks Highway, then south along the Parks Highway to a line running due east from the Highway through the town of Healy, to one mile east of the Intertie Line; inclusive of all State lands west of the George Parks Highway commonly referred to as the "Wolf Townships," and/or "Stampede Trail."

Beneficiaries of Requested Rule

- Park visitors who want to see wolves in the wild (400,000+ annual visitors).
- Tour operators and the Alaska tourism industry.
- Trappers statewide, because the public will not develop anti-harvest opinions from seeing injured wolves and learning of wolf harvest adjacent to park boundaries.
- Trappers and hunters who wish to minimize the spread of lice among Alaskan wolves.
- State of Alaska's reputation for wildlife management
- Public safety for people and pets using the Stampede Trail area

- People who value the concept of conservation areas for wildlife.

Those Disadvantaged by Requested Rule

- The two sport trappers who have operated in the area in recent years would have to relocate their trap lines out of the closed area, away from the park boundary, but would retain access to all other areas nearby open to trapping.

Benefit/Cost of Requested Emergency Rule

The significant advantages deriving from this proposed rule to Alaska citizens, Alaska's tourism economy, the State of Alaska, and others greatly outweigh the inconvenience of the two trappers having to relocate their trap lines.

VII. Conclusion

The emergency regulation is clearly appropriate for use in this case, as there is a clear threat to an important Alaska game resource, that was unforeseen and unexpected; there is significant new information showing the severity of impact of the take of wolves on state lands, with viewing success of park wolves dropping from approximately 45% in 2010, to 21% in 2011, to just 14% in 2012; there is new information presented that the drop in viewing success of Denali wolves will cost the state economy; and the Alaska Constitution requires that wildlife resources be managed for the greater public interest, not for narrow interests.

Thus, petitioners respectfully ask the Board to deliberate this issue thoughtfully, giving consideration to all of the rationale discussed herein, and to expeditiously approve the requested regulation.