

**CENTER FOR BIOLOGICAL DIVERSITY * ALASKA RAINFOREST DEFENDERS *
DEFENDERS OF WILDLIFE**

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Tom Schumacher, Regional Supervisor
Alaska Dept. of Fish and Game
tom.schumacher@alaska.gov

Doug Vincent-Lang, Commissioner
Alaska Dept. of Fish and Game
douglas.vincent-lang@alaska.gov

Kristy Tibbles, Executive Director
Alaska Board of Game
kristy.tibbles@alaska.gov

Re: Request for closure of trapping and hunting season for Unit 2 wolves

Dear Supervisor Schumacher, Commissioner Vincent-Lang, and Members of the Board of Game,

We are writing to request that you close the trapping and hunting seasons for Alexander Archipelago wolves in Game Management Unit 2 due to the inadequacy of existing management and the precarious status of this population.

Of urgent concern, the current Unit 2 Wolf Harvest Management Strategy for RY2019 - RY2021¹ (“Harvest Strategy”) is inadequate to prevent the further decimation of the wolf population on Prince of Wales and surrounding islands in 2020-2021 and beyond.

Under the Harvest Strategy, ADF&G can open a trapping and hunting season provided that the fall population estimate from the prior year is 100 wolves or more. That is, the Harvest Strategy only requires a closed season when the “most recent fall population estimate is fewer than 100 wolves.”² If the prior year’s fall population estimate is between 100-149 wolves, the season can be open up to 6 weeks; up to 2 months for a fall population estimate of 150-200 wolves; and up to 4 months for a fall population estimate of more than 200 wolves.³

A fatal flaw of the Harvest Strategy is that it does not require ADF&G to factor in mortality from the prior trapping and hunting season when setting the length of the next trapping and hunting season. As a result, ADF&G can still open a trapping and hunting season even if the prior season had wiped out most of the estimated wolf population.

¹ADF&G (2019). "ADF&G Unit 2 Wolf Harvest Strategy for RY2019-RY2021." Sept. 19, 2019, http://www.adfg.alaska.gov/static-f/research/wildlife/species/wolf/unit_2_wolf_harvest_strategy_2019_2021.pdf

² *Id.* at 4.

³ *Id.* at 4-5.

Most urgently, during the winter 2019-2020 trapping season, an unprecedented 165 wolves were trapped in Unit 2, not factoring in mortality from hunting and illegal killing.

Yet under the Harvest Strategy, ADF&G can open a 2020-2021 trapping and hunting season as long as the forthcoming 2019 fall population estimate is 100 wolves or more. For example, if the forthcoming 2019 fall population estimate is 170 wolves, similar to the fall population estimate from 2018,⁴ the Harvest Strategy would still allow trapping and hunting in 2020-2021 for up to 2 months, even though factoring in the 165 wolves killed in the prior trapping season would indicate the population had been virtually eliminated.

As such, the current Harvest Strategy for Unit 2 wolves fails to provide a scientific or rational basis for the numeric thresholds for opening a trapping or hunting season and jeopardizes this population.

The Harvest Strategy also fails to reflect the core recommendations of the 2017 Wolf Habitat Management Program (“Wolf Program”) developed by ADF&G, USFS, and USFWS for managing the vulnerable Unit 2 wolf population.⁵ The Wolf Program recommends trapping and hunting limits, in-season mortality monitoring, stronger enforcement, and road closures based on wolf vulnerabilities.

However, in 2019 ADF&G and the Board of Game eliminated hunting and trapping quotas for Unit 2 wolves⁶ and repealed the requirement that killed wolves be sealed within 14 days after take,⁷ preventing reliable in-season tracking of mortality. There is also inadequate enforcement during wolf trapping and hunting season to reduce illegal killing, contrary to the Wolf Program's recommendation. The Wolf Program recommends increasing the number of enforcement personnel on the ground, including at the beginning of the season and pre-season to help ensure limits are not surpassed, as well as requiring identification of trap ownership.⁸ The Wolf Program also recommends considering the roaded portion of central and northcentral Prince of Wales (POW) Island for a separate regulatory regime, including closures to wolf hunting and trapping along roads within Wildlife Analysis Areas (WAAs) where there are wolf mortality concerns.⁹ Yet as far as we can tell, most of the Wolf Program recommendations have not been implemented by the responsible state and federal agencies.

⁴ Federal Subsistence Management Program, Wolf harvest season announced for GMU 2, new process explained (10/30/2019), <https://www.doi.gov/subsistence/news/general/wolf-harvest-season-announced-gmu-2-new-process-explained>.

⁵ Wolf Technical Committee, Interagency Wolf Habitat Management Program: Recommendations for Game Management Unit 2, Management Bulletin R10-MB-822, USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game, March 2017.

⁶ Alaska Board of Game, January 11-15 Southeast Region Meeting, Proposal No. 43, at p.43-45, available at https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2018-2019/proposals/se_all.pdf; (beginning at 4:49:52) [listen to the BOG's Proposal 43 deliberations](#).

⁷ 5 AAC 84.270(13); Alaska Board of Game, January 11-15 Southeast Region Meeting, Proposal No. 43, at p.43-45, available at https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2018-2019/proposals/se_all.pdf

⁸ Wolf Technical Committee at 24.

⁹ Wolf Technical Committee at 25.

As a result, as noted above, in 2019-2020 an unprecedented 165 wolves were legally killed in Unit 2 during the two-month trapping season, not including wolves illegally killed and not reported.

Clearly, the Harvest Strategy is inadequate and jeopardizes this vulnerable wolf population. In the broader context, going back at least a decade, management of trapping and hunting of Unit 2 wolves has repeatedly failed to protect the ecological and genetic integrity of this population, contributing to their now precarious population status.

As detailed in our July 15, 2020 Endangered Species Act listing petition, between 1994 and 2018 the POW wolf population suffered an alarming decline of ~60% (not factoring in the unprecedented killing during 2019-2020) due in large part to legal and illegal hunting and trapping mortality. Wolves in Unit 2 are not only threatened by trapping and hunting, but also by intensive ongoing logging and road-building in their forest habitat, inbreeding depression, anthropogenic climate change, and a long history of inadequate management. Archipelago wolves in Southeast Alaska are particularly vulnerable to population declines, loss of genetic diversity, and population extirpations due to their small, isolated, and largely island-based population structure.

The Unit 2 population cannot sustain further depletion by trapping and hunting. Given the inadequacy of trapping and hunting management and precarious population status of Unit 2 wolves, we ask that you close the state trapping and hunting seasons for the threatened Unit 2 wolf population. Since the Federal Subsistence Board coordinates with the state when establishing the federal subsistence seasons, we ask that you urge the Board to do the same.

Sincerely,



Shaye Wolf, Ph.D.
Center for Biological Diversity
(415) 385-5746
swolf@biologicaldiversity.org

Larry Edwards
Alaska Rainforest Defenders
(907) 772-4403
Larry@LTEdwards.com

Patrick Lavin, J.D.
Defenders of Wildlife
(907) 276-9410
PLavin@defenders.org

Cc: Anthony Christianson, Chair, Federal Subsistence Board, subsistence@fws.gov
Earl Stewart, Forest Supervisor, Tongass National Forest, U.S. Forest Service, earl.stewart@usda.gov
Greg Siekaniec, Alaska Regional Director, U.S. Fish and Wildlife Service, greg_siekaniec@fws.gov