

**DEFENDERS OF WILDLIFE * CENTER FOR BIOLOGICAL DIVERSITY *
SOUTHEAST ALASKA CONSERVATION COUNCIL**

Forest Supervisor Earl Stewart
Tongass National Forest
648 Mission Street
Federal Building
Ketchikan, AK 99901-6591

April 14, 2020

VIA EMAIL

Re: The Forest Service Must Implement the GMU 2 Wolf Habitat Management Program Due to Renewed Mortality Concern for Wolves.

Dear Forest Supervisor Stewart:

As you are aware, the Alaska Department of Fish and Game (ADFG) reported an unprecedented 165 wolves legally trapped in Game Management Unit 2 (GMU 2) in the two-month trapping season that ended on January 15.¹ This number represents a shocking 97 percent of the mean estimate of 170 wolves in GMU 2 in Fall 2018 and does not include any wolves taken illegally. ADFG has abandoned any harvest limit on this vulnerable wolf population and intends to continue to manage without a quota during the upcoming season. As we detail below, it is incumbent upon the Forest Service to intervene and implement the Wolf Habitat Management Program, as mandated by the Tongass Forest Plan.

Although the Fall 2019 population estimate will not be available until August or September, we urge the Forest Service to again recognize a mortality concern for wolves in GMU 2 and work with ADFG to ensure a sustainable hunting and trapping level in 2020-21 and beyond, including a return to the quota system. Close collaboration and alignment are again necessary to ensure that the agencies' mutual interest in maintaining sustainable wildlife populations is achieved in the Tongass National Forest for wolves on Prince of Wales and nearby islands.

Regulations implementing the National Forest Management Act (NFMA) require the Forest Service to maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area, including maintaining species composition and diversity.² The Tongass Forest Plan requires the Forest Service to "assist in maintaining long-term sustainable wolf populations."³ More specifically, where there is a "mortality concern" for wolves, the agency must "develop and implement a Wolf Habitat Management Program in conjunction with ADF&G. To assist in managing legal and illegal wolf mortality rates to within sustainable levels,

¹ ADFG Advisory Announcement, March 5, 2020, available at <http://www.adfg.alaska.gov/static/applications/webintra/wcnews/2020/releases/03-05-2020.pdf>

² 36 C.F.R. § 219.9; 219.19 (defining ecological integrity).

³ 2016 Tongass Land Use Management Plan at 4-91.

integrate the Wolf Habitat Management Program (including road access management) with season and harvest limit proposals”⁴

Until recently, there was a recognized mortality concern for GMU 2 wolves, a population that had decreased from a mean estimated 336 animals in 1994, and 326 in 2003, to just 221 in 2013 and 89 animals in 2014.⁵ That concern led the Forest Service, U.S. Fish and Wildlife Service, and ADFG to develop a Wolf Habitat Management Program (“Wolf Program”).⁶ The Wolf Program identified the key components of wolf management in GMU 2 as deer habitat, roads, mortality, den management, and human dimensions, providing key recommendations in each category. Notably, this interagency group considered quotas to be an important management tool in regulating mortality, as reflected in these harvest management recommendations:

- Maintain flexibility in quota management to alter quotas on a yearly basis to ensure wolf population and harvest sustainability.
- Continue to incorporate unreported human-caused mortality rates in developing wolf harvest quotas using best available data.
- Monitor the wolf population to help evaluate program effectiveness.
- Prioritize and increase enforcement in pre-season and beginning of season, increase enforcement capabilities, and prioritize wolf trapping season patrols in GMU 2.⁷

The agencies also collaborated to establish hunting and trapping limits designed to help the wolf population rebound. From regulatory year 2015 to 2018, the Forest Service and ADFG kept the legal limit at or below the maximum rate allowed by regulation at the time: 20% of the pre-season autumn population estimate.⁸ Since 2013 autumn population estimates have been based on a more precise and efficient estimation method involving non-invasive hair-snaring to collect DNA for spatially explicit capture-recapture, resulting in higher confidence in these estimates.⁹ The population recovered from a mean estimated low of 89 wolves in Fall 2014 to an estimated 231 animals in Fall 2016 and 225 in Fall 2017 before falling to 170 animals estimated in Fall 2018.

At that point, despite the falling population estimate and despite being in the early stages of Wolf Program implementation in response to a well-documented mortality concern for GMU 2

⁴ Id.

⁵ USFWS, Species Status Assessment for the Alexander Archipelago Wolf at 18 (November 23, 2015).

⁶ Wolf Technical Committee. 2017. 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.

⁷ Wolf Program at 25.

⁸ U.S. Forest Service and Alaska Department of Fish and Game, News Release, “2018 GMU 2 Wolf Harvest Quota Announced,” October 18, 2018. See also former 5 AAC 92.008 (setting the 20% harvest limit).

⁹ Roffler, Gretchen H. et al., Estimating abundance of a cryptic social carnivore using spatially explicit capture-recapture, 43 Wildlife Society Bulletin 31 (2019).

wolves, ADFG considered the population to have recovered to a stable position. It proposed and the Board of Game approved changing the management objectives and approach for GMU 2 wolves.¹⁰ ADFG now manages to achieve a population objective of 150-200 wolves in GMU 2 and has abandoned any harvest limit,¹¹ straying from the Wolf Program and its own wolf management plan which also envisions using quotas to manage wolf hunting and trapping.¹² It also repealed the requirement that GMU 2 wolves be sealed within 14 days after the date of taking, eliminating this source of in-season information.¹³

These significant changes resulted in the legal trapping of 165 wolves from a population estimated in Fall 2018 at 170 animals.¹⁴ This was the highest mortality level ever recorded for this population; the closest in the last 20 years was 77 wolves killed in 2004.¹⁵ If the 20% limit had been applied for the 2019-20 season, the legal maximum take would have been 34 wolves. Additionally, the 165 reported wolves does not include animals killed by illegal hunting and trapping, which has been documented at a high level in GMU 2.¹⁶ It is virtually certain that this record high level of mortality will not comport with any definition of “sustainable” when the Fall 2019 population estimate is available later this year. Yet ADFG apparently plans to continue to manage GMU 2 wolves with no harvest limit for whatever duration it opens the season in 2020-2021.¹⁷

In eliminating any quota and in-season management options for GMU 2 wolves, ADFG abandoned the clear direction set out in the Wolf Program and ran the risk of the subsequent

¹⁰ See Alaska Board of Game, January 11-15 Southeast Region Meeting Proposal No. 43 (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

¹¹ 5 AAC 92.008(1) (150-200 population objective); 5 AAC 84.270(13) (no harvest limit on wolves in GMU 2);

¹² ADFG, Wolf Management Report and Plan, Game Management Unit 2: Report Period 1 July 2010–30 June 2015, and Plan Period 1 July 2015–30 June 2020 (2018) at p.13 (stating the management goal is to “Maintain a population that supports sustainable harvest and viewing through regulation of hunting and trapping seasons, bag limits, and harvest guidelines.”).

¹³ Proposal No. 43 at p.44 (repealing 14-day sealing requirement); see also ADFG, 2019-20 Trapping Regulations at 24 (general sealing requirement for wolves is 30 days after season closes).

¹⁴ ADFG Advisory Announcement, March 5, 2020, “Trappers Harvest Record Number of Wolves on Prince of Wales and Associated Islands in 2019/2020.”

¹⁵ ADFG Advisory Announcement, March 5, 2020, available at <http://www.adfg.alaska.gov/static/applications/webintra/wcnews/2020/releases/03-05-2020.pdf>

¹⁶ E.g., Person and Russell, “Correlates of Mortality in an Exploited Wolf Population,” *Journal of Wildlife Management* 72(7): p.1540-49 (2008) (16 of 34 (47%) harvested radio-collared wolves were killed illegally); Wolf Program at 24 (“Unreported human-caused mortality has been documented in GMU 2 at rates of 38% (Roffler et al. 2016a) and 47% (Person and Russell 2008) of collared wolves killed by humans (3 of 8 and 16 of 34 wolves, respectively)”); ADFG, Wolf Management Report and Plan, Game Management Unit 2: Report Period 1 July 2010–30 June 2015, and Plan Period 1 July 2015–30 June 2020 (2018) at p.8 (noting Person study and adding that “Accounting for [illegal harvest] in setting annual harvest quotas remains a contentious issue.”). The absence of a quota may have reduced illegal harvest in 2019-20, but out-of-season take could have still been an issue.

¹⁷ *Id.*

unsustainable take that occurred.¹⁸ It plans to potentially run that risk again in 2020-2021. The Forest Service must ensure a sustainable hunting and trapping level next season and beyond.

In sum, due to renewed mortality concerns about GMU 2 wolves in light of the unprecedented number of wolves killed in 2019-2020, and ADFG's abandonment of some of the key management tools that help ensure sustainability, the Forest Service must step up and promptly implement the Wolf Program, as mandated by the Tongass Forest Plan. This program implementation includes maintaining sustainable hunting and trapping levels as well as habitat, road, and den management approaches set forth in the Wolf Program document.¹⁹ As part of a robust public process and working together with ADFG, we urge the agency to reinstate and enforce a conservative hunting and trapping quota, in-season monitoring, and increased enforcement among other actions to conserve GMU 2 wolves.

Thank you for consideration of these comments. We look forward to your prompt response and further discussions.

/s/

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¹⁸ ADFG explained its thinking in its proposal: "The 20 percent [Harvest Guideline Level] now inhibits the Department's ability to manage growth of the Unit 2 wolf population and is unpopular with trappers and deer hunters." Proposal 43 at p.44. The Forest Plan, however, directs the Forest Service to "provide, where possible, sufficient deer habitat capability to **first maintain sustainable wolf populations, and then to consider meeting estimated human deer harvest demands.**" 2016 Tongass Land Use Management Plan at p.4-91 (emphasis added). A dramatically reduced amount of deer habitat capability due to extensive logging on Prince of Wales Island is at the root of the problem for both agencies in seeking to provide sustainable populations of wolves and deer.

¹⁹ While the Forest Service may see fit to modify its application of some of the Wolf Program recommendations based on scientific understanding that has developed since their publication, it must nonetheless implement those recommendations consistent with current science.