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

October 21, 2020

VIA EMAIL

Re: Request for Closure of the Hunting and Trapping Seasons for GMU 2 Wolves

Dear Forest Supervisor Stewart:

We hereby request that the Forest Service not allow any hunting or trapping of wolves on Prince of Wales (POW) and surrounding islands for the 2020-2021 season.

At the Southeast Regional Advisory Council meeting yesterday, the Alaska Department of Fish and Game (ADFG) indicated that they have the Fall 2019 population estimate of GMU 2 wolves in hand but have not yet reached agreement with the Forest Service on the appropriate harvest management strategy for the upcoming season in light of that information. ADFG appeared to indicate that there would be a trapping season of some kind, which we found surprising. Our understanding is that all parties consider the 165 wolves recorded as legally trapped in GMU 2 in 2019-2020 an unsustainably high level of mortality barring an unlikely, very high Fall 2019 population estimate.

ADFG also indicated that it intends to reach an agreement with the Forest Service in the coming days, and then simultaneously announce the Fall 2019 population estimate and the agencies' decision regarding the upcoming season. We had intended to await the population estimate before requesting anything of the Forest Service regarding the upcoming season. But because these two things will now be announced together, we feel compelled to urge you now to close the season barring some unexpectedly large increase in the population estimate.

As you know, prior to the abandonment of the quota system last season, previous quotas generally allowed a maximum reported take of 20% of the population, and much less than that when the pre-season population estimate was low. The Fall 2019 estimate would thus need to be 825 wolves for the 165 known killed to fall within the maximum quota that has been considered sustainable. That would be orders of magnitude greater than any previous estimate.

Thus, it seems safe to say that GMU 2 wolves suffered an extreme level of mortality from trapping last season, from both a percentage and sheer numeric standpoint compared to historic statistics. An important first step toward improving the outlook for these wolves is eliminating this trapping pressure this year.

This would only be a first step. As explained in our letter dated April 14, 2020, the Forest Service must implement the Wolf Habitat Management Program for GMU 2 (“Wolf Program”) as required by the Tongass Forest Plan. We look forward to discussing implementation of the Wolf Program with agency staff at the earliest opportunity following your decision regarding the hunting and trapping season.

Thank you for your attention to this important matter and we look forward to your prompt response.

Sincerely,

/s/

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Cc: Tom Schumacher, Regional Supervisor, Alaska Dept. of Fish and Game
Anthony Christianson, Chair, Federal Subsistence Board, subsistence@fws.gov
Greg Siekaniec, Regional Director, U.S. Fish and Wildlife Service