ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM, P.O. BOX 25526, JUNEAU, ALASKA 99802-5526
BOARD OF FISHERIES REGULATIONS □ Fishing Area _____
□ Subsistence □ Personal Use □ Sport □ Commercial

JOINT BOARD REGULATIONS □ Advisory Committee □ Regional Council □ Rural

BOARD OF GAME REGULATIONS
Game Management Unit (GMU) __2_____ **X** Hunting **X** Trapping
□ Subsistence □ Other _____
□ Resident
□ Nonresident

Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.

1. Alaska Administrative Code Number 5 AAC 85.056, hunting seasons and 5 AAC 84.260 - 5 AAC 84.275, trapping seasons for wolves

2. What is the problem you would like the Board to address?

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf that is genetically distinct from interior Alaskan wolf populations and lives in geographically and genetically isolated island populations in Southeast Alaska. Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will likely continue to impact wildlife species. Biologists expect to see a decline in deer populations throughout the region due to changes in forest habitat quantity and quality. Deer are the main prey of wolves in the Tongass and any decline in deer will trigger a decline in wolf populations. Thus concern over the continued long-term viability of this genetically distinct wolf population will continue to grow.

Research by Person and Russel concluded the annual mortality of wolves due to illegal harvest in Unit 2 was 19% while the legal harvest mortality was 23%. According to the Alaska Department of Fish and Game (ADF&G), the maximum sustainable level of harvest for wolves is approximately 30-35% but can be lower when ungulate populations are low. The total annual harvest of 42% in Unit 2 therefore exceeds the 30% harvest cap implemented by the BOG in 1997 and is above the sustainable harvest of wolves reported by ADF&G. Biologists working in the field on Unit 2 have seen little wolf sign this year, indicating a likely population decline.

We encourage the BOG to help protect the integrity of this complex forest system and the viability of each segment of the Alexander Archipelago wolf population by regulating the harvest so as not to exacerbate potential population declines. We encourage the BOG to consider the excessive illegal harvest of wolves in Unit 2 when setting regulations for future harvest. We further request that the BOG address the issue of illegal harvest by any

means practicable including calling on the Department of Public Safety to take the steps necessary to resolve the issue.

It is difficult to craft a single recommendation for how regulations should be adjusted to insure the continued viability of this wolf population. Rather, the BOG must utilize the best available biological and social information to determine the best course of action and consider implementing multiple regulatory changes.

Background and justification

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf endemic to Southeast Alaska, whose individual island and mainland populations are geographically and genetically isolated from one another. As well, this subspecies is genetically distinct from interior Alaska wolves. Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will likely continue to impact wildlife species in this region including deer and wolf populations. The long term carrying capacity of forest habitat must be considered when making wildlife management decisions including regulating take of wolves in Southeast Alaska. Regulations must be put in place that seek to maintain an ecological balance of both predators and prey in this unique system.

Wolves in Unit 2 in particular have a past history of heavy harvest which was thought to be excessive. Due to these concerns a harvest cap of 30% of the fall population was instituted by the BOG in 1997. The harvest cap was first reached in 1999 and harvest was halted. Since that time reported harvest has declined; thus, harvest data obtained by ADF&G does not accurately represent the entire harvest. Further, no recent population estimates are available for Unit 2 on which to determine whether the harvest cap has been achieved or surpassed.

A petition to list the Alexander Archipelago wolf under the Endangered Species Act was filed in 1993 and many of the issues affecting its conservation have not been resolved. Despite the harvest cap instituted in 1997, evidence suggests that excessive harvest continues to be of concern for the segment of the population in Unit 2, due in part to the high density of roads resulting in easy access to remote parts of the Unit.

By promoting the conservation of Alexander Archipelago wolf in Unit 2 the BOG would demonstrate that it is fulfilling its mission of managing big game and furbearers on a sustained yield basis using sound conservation principles. It would further demonstrate the BOG's concern for the conservation of rare and endemic species. It would demonstrate that wolves have value to hunters, trappers and other users and are not undesirable animals that need to be reduced.

3. What will happen if this problem is not solved?

If regulatory mechanisms meant to protect this segment of the subspecies are not put in place, over-harvest of the population will likely continue. Therefore, concern over the

continued viability of the subspecies will continue to grow and the potential need for listing the Alexander Archipelago wolf under the Endangered Species Act will increase.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

In order to facilitate a reduction in the illegal unreported take of wolves in Unit 2 we propose that the BOG implement the following regulatory change:

Require that traps and snares be marked with owner's name and contact information.

In order to help avoid the over-harvest of wolves in Unit 2 we also propose that the BOG implement one or more of the following regulatory changes:

1. *Reduce the harvest cap*
2. *Reduce the time limit for checking traps and snares*
3. *Reduce time to report harvested animals for sealing*
4. *Introduce bag limits for trapping*

In addition to the above regulatory changes, the BOG must work with the Department of Public Safety to insure the enforcement of current and future regulations for wolf hunting and trapping.

Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

This proposal aims to promote the long-term viability of an endemic and genetically isolated wolf population. Actions taken to support the long-term viability of wolves in Unit 2 will help insure that wolves in this unit continue to be available for hunters, trappers and other user groups.

6. Solutions to difficult problems benefit some people and hurt others:

A. Who is likely to benefit if your solution is adopted?

Hunters will benefit as the proposal aims to insure that wolves will continue to be available for future harvest. Those who value the conservation of rare and endemic species for their ecosystem value will also benefit.

B. Who is likely to suffer if your solution is adopted?

No one—with the possible exception of a small number of individuals who believe predator numbers need to be reduced without concern for the continued viability of unique and endemic wolf populations.

5. List any other solutions you considered and why you rejected them.

None.

DO NOT WRITE HERE

Submitted By: Defenders of Wildlife
By signature: _____

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BOARD OF GAME REGULATIONS
Game Management Unit (GMU) __1,3,4,5_____ **X** Hunting □ Trapping
□ Subsistence □ Other _ _____
□ Resident
□ Nonresident

Please answer all questions to the best of your ability. All answers will be printed in the proposal packets along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal.

1. Alaska Administrative Code Number 5 AAC 85.056, Hunting seasons for wolves

2. What is the problem you would like the Board to address?

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf that is genetically distinct from interior Alaskan wolf populations and lives in geographically and genetically isolated island populations in Southeast Alaska. Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will likely continue to impact wildlife species. Biologists expect to see a decline in deer populations throughout the region due to changes in forest habitat quantity and quality. Deer are the main prey of wolves in the Tongass and any decline in deer will trigger a decline in wolf populations. Thus concern over the continued long-term viability of this genetically distinct wolf population will continue to grow.

Wolf hunting seasons in GMU 1, 3, 4 and 5 are excessively long and begin in the summer (August 1) when pups are still totally dependent on adults for food and protection and hides are not prime. Seasons extend late into the spring (April 30) when females are pregnant, dens are being established and fur quality is poor. There is no evidence that opening wolf hunting seasons early and closing them late is beneficial for deer or mountain goat numbers, nor is there evidence that predation is limiting these populations. Any rationale for having excessively long seasons in order to benefit prey populations is therefore invalid and seasons can be shortened to better manage wolves as big game animals and furbearers rather than as predators we need to reduce. Predator and Prey populations must be managed as a complete system; managing for high deer populations at the expense of viable wolf populations in the Tongass is not feasible and neither ecologically sustainable nor acceptable.

Wolves play an important role in buffering prey species against dramatic population fluctuations and maintaining overall ecosystem health. We encourage the BOG to help protect the integrity of this complex forest system and the viability of each segment of the

Alexander Archipelago wolf population by regulating the harvest so as not to exacerbate population declines.

Background and justification

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf that is genetically distinct from interior Alaskan Wolves. These populations are endemic to Southeast, isolated from the mainland, and isolated from each other by large bodies of water. Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will continue to impact all wildlife species in this region. The issue of forest management and long term carrying capacity of forest habitat need to be considered when making wildlife management decisions and regulations for Southeast Alaska.

Prior to statehood, wolves throughout Alaska were managed as predators – undesirable animals that should be reduced or eliminated. During the 1950s, federal efforts to eliminate wolves over vast areas employed poison, aerial shooting, trapping, cyanide guns, bounties, and denning. After statehood, aerial shooting and bounties continued until 1972. Wolves were eventually classified as big game animals and furbearers and managed like other species with hunting and trapping seasons and bag limits to protect populations from over-harvesting.

By the 1970s there were calls for wolf control as ungulate populations declined and hunter demand increased. The Board of Game (BOG) complied and authorized Alaska Department of Fish and Game (ADF&G) biologists to shoot wolves from helicopters in several areas. About 1,300 wolves were taken during 1975-1983 at a cost of $824,000.

In 1994, the Intensive Management statute (IM) passed the legislature. This mandated that depleted ungulate populations found important for human harvest be restored to former levels of abundance. The primary intensive management tool is predator control. Since the IM law passed the BOG has adopted various IM programs. These have allowed private pilots to shoot wolves from the air and on the ground. In addition, the BOG lengthened wolf hunting and trapping seasons and increased bag limits over virtually the entire state. The BOG's rationale was that taking these actions might increase wolf harvests, reduce wolf numbers and increase ungulate prey. In essence, this is de facto wolf control.

Wolf hunting seasons in GMU 1, 3, 4, and 5 now open on August 1 and close on April 30. On August 1 wolf pups are only about half grown and are totally dependent on adults for food and protection from predators including bears. In August, wolf hides are nearly worthless on the fur market and make very poor trophies. Hides are not in prime condition until several months later.

According to ADF&G most wolf hunting and trapping that occurs in Southeast is recreational and viewed by many as simply a means of controlling wolf populations to improve deer and moose populations. While wolf hunting seasons such as those currently

in effect might be justified if de facto wolf control was necessary and the regulations accomplished the goal of reducing wolf numbers and increasing prey, there is no evidence that any of these conditions apply. The BOG has issued no written findings indicating deer populations in southeast Alaska currently require predator control to increase deer numbers – in fact the bag limit for deer in GMU's 1,3, and 4 is at least 2 and up to 4 animals in GMU's 1,3,and 4 and all units remain open to non-resident hunters.

Accordingly, we find that there is no rationale for de facto wolf control in Southeast Alaska and the excessively long hunting seasons designed to provide de facto wolf control are not justified. In late April, female wolves are pregnant and nearly at full term. Shooting them is inhumane and not sound management for a subspecies of conservation concern, or one with big game and furbearer values. Hides in late April are often badly rubbed and have much reduced value on the fur market. They make poor quality trophies for recreational hunters. We propose shortening the wolf hunting seasons in GMU 1, 3, 4 and 5 in order to humanely protect pups still dependent on adults in summer and pregnant females in late April, and to provide hides for hunters that have better fur value, either in the commercial market or as trophies.

In the fall of 2002 the BOG voted to close hunting in the months of August and April due to concerns over early and late season pelt quality and harvesting during denning. However, this decision was rescinded in the fall of 2004. We believe this decision was an oversight as the concerns that led the BOG to shorten the hunting season in 2002 still apply.

A petition to list the Alexander Archipelago wolf under the Endangered Species Act was filed in 1993 and many of the issues affecting its conservation have not been resolved. Shortening the hunting season for the Alexander Archipelago wolf would demonstrate that the BOG is fulfilling its mission of managing big game and furbearers on a sustained yield basis using sound conservation principles and that the BOG has concern for the conservation of rare and endemic species. It would also demonstrate that wolves have value to hunters, trappers and other users and are not still undesirable animals that need to be reduced everywhere, all the time.

3. What will happen if this problem is not solved?

Orphaned wolf pups in summer and early fall will continue to starve and die inhumanely. Pregnant, full-term female wolves will be shot in April. Hunters will continue to take wolves with less than prime fur, a waste of a valuable, renewable resource. Hunters will continue to take poor quality trophies. Unnecessary de facto wolf control programs will continue. A unique and endemic subspecies of wolf will continue to be unnecessarily targeted for population reduction thus increasing conservation concern over this sub-species. Wolves will continue to be unnecessarily managed as predators rather than as big game animals and furbearers of considerable value. The public will continue to view the BOG as managing wolves only as predators to be reduced by any means available.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

Change the wolf hunting season dates in GMU 1, 3, 4 and 5 to open on September 1 and close on March 31.

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

The quality of harvested wolf hides would increase. Hides in late April are often badly rubbed and have much reduced value on the fur market. They make poor quality trophies for hunters. Similarly, wolf hides taken in August are not prime. The resource will continue to be available to user groups in the future.

6. Solutions to difficult problems benefit some people and hurt others:

A. Who is likely to benefit if your solution is adopted?

Hunters will benefit by taking wolves during times when pelt quality is higher. Such hides have greater commercial and trophy values than those taken in August or April. Those who value the conservation of rare and endemic species purely for their ecosystem value will also benefit.

B. Who is likely to suffer if your solution is adopted?

No one – with the possible exception of a small number of hunters who wish to take wolves during times when fur quality is poor or those who believe predator numbers need to be continually reduced.

6. List any other solutions you considered and why you rejected them.

None.

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