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## Alaska Wildlife Alliance comment on Proposal 3



**PC3**

AWA is **OPPOSED** to this proposal. The data collected during sealing (skull measurements, teeth age, and sex) are the primary means for assessing whether harvest is excessive (skull measurements and teeth aging).

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## Alaska Wildlife Alliance comment Proposal 4



**PC3**

AWA is OPPOSED to this proposal.

Changing brown bear harvest from 1-in-4 to 1- in-2 is one of the ways that bear harvest has been increasingly “liberalized” in Alaska since 2012 without the safeguard protocols that Alaska Department of Fish and Game (Department) requires of formal Intensive Management (feasibility assessments, statement of objectives, and monitoring of outcomes) (Sterling Miller et al. 2017 - Trends in brown bear reduction efforts in Alaska, 1980-2017). Furthermore, brown bears are NOT increasing in Unit 1, at least in 1D. Quite the opposite in fact. According to the Department “The level of human-caused brown bear mortality in 2020 exceeded sustainable yield, and without conservation measures would result in a long-term decline in sustainable harvest opportunity. Population modeling indicates that recovering the bear population and future hunter harvest opportunity requires limiting mortality, particularly for adult female bears, for about 5 years [2021–2025]” ([2022 Brown Bear Management Plan For Game Management Unit 1D](#)).

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## Alaska Wildlife Alliance comment Proposal 23



PC3

Alaska Wildlife Alliance is OPPOSED to this proposal.

The Board previously tried to get rid of the two non-motorized hunt areas off the Denali Highway (Unit 13). There was a lot of public pushback and that effort was dropped. This proposal to introduce e-bikes is yet another way to undermine non-motorized hunting opportunities in Alaska. The whole point of designating non-motorized hunt areas is to provide hunters the opportunity of a human-powered hunt. Electric motors (at any wattage) are still motors, and make it much easier to access the backcountry for hunting than human-powered means.

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## Alaska Wildlife Alliance comment Proposal 27



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal.

- A setback does not shut down trapping, and we do not believe it is the intent of the author to stop trapping in this region. This proposal simply aims to provide safe recreational corridors on prominent public routes (maintained roads and established hiking trails).
- Trappers can still use these areas as an access point for trapping.
- Trappers will still have the opportunity to trap where harvestable surplus exists.
- We believe the trapper code of ethics is compatible with reasonable setbacks. For example, Code of Ethics, number 3: “Promote trapping methods that will reduce the possibility of catching non-target animals.” Presumably this means ethical trappers are *already* voluntarily trapping away from highly used areas where non-target animals (dogs) could be caught. Since this is already part of the code of ethics, a regulated setback would not burden ethical trappers who are already enacting voluntary setbacks. This regulation would only limit trappers who are not following the code of ethics and trap on/near high-use areas.

**AWA recommends the following amendment:**

Provide an opportunity for the proposal author to clarify which roads and trails they seek setbacks.

## Alaska Wildlife Alliance general comments on Proposals 45 and 47-54



**PC3**

Alaska Wildlife Alliance SUPPORTS these proposals

On behalf of our Alaska-based membership, Alaska Wildlife Alliance (AWA) submits the following comments in support of Proposal 45 and Proposals 47 through 54. The AWA proposals have been submitted to improve upon the 2019 (proposal 43) Board of Game (Board) wolf management framework implemented in Game Management Unit 2 (GMU 2). The 2019 management framework (Framework) for wolves in GMU 2, which relies exclusively on season length to control harvest, is inconsistent with sound wildlife management practices when trying to sustain a genetically distinct, vulnerable and isolated population of wolves. The implementation of the Framework resulted in an immediate unsustainable wolf harvest, a petition for listing the species as threatened or endangered, and a lawsuit by AWA to ensure the population is managed sustainably relative to the Alaska State Constitution. Furthermore, the Framework has now morphed into an ill-defined public process that frustrates trappers and hunters and continues to put the GMU 2 wolf population at risk for listing as an endangered or threatened species.

To understand the importance of why these proposals were submitted, it is essential to review recent events that demonstrate how far the Alaska Department of Fish and Game (Department) has veered from the 2019 management framework. The fall population estimate and season length scale that was outlined in the Framework has been abandoned. Subsequently, this has led to an unpredictable, convoluted and non-transparent public process to set seasons and control harvest. The current ad hoc method of setting varied season lengths to control harvest is now decided by the Department without clear disclosure to the public and without identifying what harvest levels are acceptable pre-season. This is a risky management framework to impose on such a vulnerable population. Providing transparency, by actually setting a harvest quota as done prior to 2019 (AWA Proposals 51/52/53) and establishing tighter reporting requirements (AWA Proposal 47) are minimum steps to ensuring sustainable management of this population. AWA Proposals 45, 49 and 50 provide precautionary approaches to identifying and setting appropriate population objectives until research is completed to determine a viable population objective (AWA Proposal 48). Finally, AWA Proposal 54 offers an alternative management concept the Department could explore that is based on establishing protected areas.

In October of 2022, AWA representatives attended a deer summit meeting on Prince of Wales Island (POW). The goal of the meeting was to foster an understanding and dialog among a diverse array of experts regarding the challenges of deer management on POW. Fundamentally acknowledged during the 3-day workshop was that habitat loss was the primary limiting factor for sustaining a healthy deer population. Other important factors influencing deer populations included overharvest of deer, overharvest of doe deer, climate change, wolf and bear predation, and disease. It was an amazing 3-day meeting that brought together the most knowledgeable people to candidly and respectfully discuss the diverse and challenging issues facing wildlife management on POW. It was acknowledged

that predators (wolf and bear) influence the deer populations on POW but they should not be considered the most important factor to control when trying to manage POW deer populations. Restoration of habitat, reducing future old growth timber harvest, and control of deer harvest were higher priorities.

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In closing, the goal in submitting nine proposals is to provide the Board with a range of options to improve the wolf management program in Unit 2 and ultimately ensure the population is not listed but remains sustainable and genetically viable into the future. Another goal is to request the Board adopt more transparent methods that can provide predictability on how seasons will be set and what factors are being used by the Department to establish seasons and trigger emergency closures when warranted. We acknowledge the difficulty in estimating this wolf population and we commend the Department, partners, trappers and hunters for their continued efforts to gather data that are critical to formulating the best possible population estimates. We sincerely hope the Board adopts many of these proposals as a means to provide a transparent management framework that works effectively to sustain the unique wolves of POW and is clearly understood by the public.

# Alaska Wildlife Alliance comment Proposal 45



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal.

## **Proposal Goal**

- Manage for a unit wide wolf population that is sustainable into the future and reduces the possibility it will be listed as threatened or endangered.
- Raise the population objective from 150-200 wolves to 250-350 wolves and raise the threshold for closing the season from 100 to 200 wolves.

## **What is the Problem**

- The current minimum population threshold of 100 wolves is very low, along with the current population objectives of 150-200 wolves.
- The Board should not have been tasked with identifying the minimum population threshold needed to maintain a genetically distinct and vulnerable population of wolves. That is the job of professional biologists that can analyze and model historic and current data.
- When the Board decided to set 100 wolves as the minimum viable population they did not include consideration of a multitude of factors like: the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecking; susceptibility to rabies and disease; changes in habitat conditions due to logging/climate change, etc.
- The Department conducted no population viability analysis to support the Board's decision to set 100 wolves as the minimum acceptable level.
- At a public hearing in Prince of Wales on November 9th, 2021, the Department representative stated, that "new genetic data raises questions about genetic diversity to prevent inbreeding" in Unit 2 and that the agency was keeping the trapping season short (one month) because, "the population objective might not be genetically sustainable."
- A small residual population of 100 wolves could be feasibly extirpated or seriously compromised genetically due to inbreeding.

## **Why is the proposal important**

- Until a biological viability analysis has been completed as proposed in AWA's Proposal 48, the Board and Department should take a precautionary approach to managing the Unit 2 wolves to ensure they remain off the Threatened and Endangered species list.
- Raising the Unit 2 population objectives and minimum population objective would be a good and simple precautionary step to ensuring that the genetic diversity of the population is



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protected until more rigorous data analysis has been completed to establish these parameters.



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- History indicates this wolf population has likely hovered around 250 -300 wolves while maintaining a harvest of 30%. Raising the population threshold and objectives is a step towards sustainable management.



# Alaska Wildlife Alliance comment Proposal 47



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## Proposal Goal

Ensure that the risk of overharvesting Unit 2 wolves is minimized.

## What is the Problem

A shorter reporting period is needed to ensure overharvest does not occur. With a seven-day reporting period there is a much greater risk of overharvesting wolves in Unit 2.

## Potential Management Example

**7 Day Reporting Requirement:** Season opens Nov. 15 and Closes Dec 15 and trappers can record their harvest 7 days after harvest. There are 3 trappers. Department quota for the year is **20 wolves**. We understand that the State is not officially managing this population with a quota, but we assume the State has an internal harvest goal that is used to determine when the season is closed or shortened by emergency order.

Season Day	Trapper 1	Trapper 2	Trapper 3	Wolves Trapped/day	Cumulative Wolf harvest
Day 1 Nov 15	2	1	3	6	6
Day 2 Nov16	0	4	2	6	12
Day 3 Nov17	2	1	1	4	16
Day 4 Nov18	4	0	2	6	22
Day 5 Nov 19	2	2	0	4	26
Day 6 Nov20	0	0	2	2	28
Day 7 Nov 21	1	1	2	4	32
<b>Total Day 7</b>				<b>32</b>	
Harvest that could happen from Nov 22- 25	4	6	4	14 (for a 4 day period)	<b>46</b>
<b>What does the State Know based on 7 day reporting requirement</b>					
On Day 8 (Nov 22) The total reported to State as per regulation.				6 wolves reported on Day 8 (Nov 22) as only those harvested on day 1(Nov 15) need to be reported.	
On Day 9 (Nov 23) Total reported to State as per regulation.				12 total wolves now reported to State	
On Day 10 (Nov 24) Total reported to State as per regulation.				16 wolves reported total	
Day 11 (Nov 25) STATE STOPS HUNT as they know 22 wolves have been harvested Between Nov 15-18.				22 wolves reported total	

In this scenario by Day 11 (Nov 25) of the season, 22 wolves have been reported harvested and the State shuts down the season. However, in reality the Department will need to add 24 more wolves

that were harvested between Day 5 (Nov 19) – Day 11 (Nov 25) of the season that had yet to be reported. Thus the Department will realize that 46 wolves were actually harvested when they shut the season down on Day 11 (*26 wolves/230% over their quota*).



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**2 Day (48 hr) reporting requirement:** Same harvest as above scenario

Season Day	Trapper 1	Trapper 2	Trapper 3	Wolves Trapped/day	Cumulative Total
Day 1 Nov 15	2	1	3	6	6
Day 2 Nov 16	0	4	2	6	12
Day 3 Nov 17	2	1	1	4	16
Day 4 Nov 18	4	0	2	6	22
Day 5 Nov19	2	2	0	4	26
Day 6 Nov 20	0	0	2	2	28
Day 7 Nov 21	1	1	2	4	32
Total Day 7				26	
On Day 3 (Nov 17) Total reported to State as per regulation.				6 total wolves reported on Day 3 (Nov 17) as only those harvested on day 1 (Nov 15) need to be reported.	
On Day 4 (Nov 18) Total reported to State as per regulation.				12 (add in 6 from day 2 harvest) etc.	
On Day 5 (Nov 19) Total reported to State as per regulation.				16	
On Day 6 (Nov 20) Total reported to State as per regulation.				22 – State STOPS HARVEST	

In this scenario the Department knows by Day 6 (Nov 20) of the season they have harvested 22 wolves and stop the Season. However, the Department would realize an additional 6 wolves were harvested from Nov 19-20 (Days 5-6). Thus, they would stop the harvest season with 28 wolves harvest (*8 wolves/125% over the quota*).

**Why is the proposal important**

- As indicated by the examples above, the Department can be much more effective at monitoring harvest and meeting a potential harvest quota by implementing a shorter reporting requirement. The example clearly shows that a 7-day reporting requirement allows for a much greater risk to overharvest (over harvest of 28 wolves from their objective of 20) than a 2 day reporting requirement (over harvest of 8 wolves from their objective quota of 20).
- Unit 1D has a 48 hour reporting requirement for wolves indicating this is feasible and the Department has a system in place that can work



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- The number of individuals required to follow this simple reporting requirement is small
  - We suggest a cell phone call to a recorded Department line within 48 hours of recovery – a minimal burden.



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# Alaska Wildlife Alliance comment Proposal 48



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Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

Establish a Scientifically based minimum population objective for Unit 2 wolves

## **What is the Problem**

- The Board's calculation and adoption of a spring population objective between 135-180 wolves, and setting 100 wolves as the lowest acceptable limit of wolves for Unit 2, is not based on a scientific analysis.
- The Board is not the appropriate group to develop the minimum viable population objectives for this vulnerable population. The Department has access to the technical experts that should formulate the population objectives and identify the minimum viable population objective.
- These population objectives pose a credible threat to the sustainability of this vulnerable and genetically unique population that is under review to determine if it should be listed as a threatened or endangered species.

## **Potential Management Example**

- The Board of Game's main role is to conserve and develop Alaska's wildlife resources. This population of wolves has been petitioned for ESA listing multiple times. It is also an island population, which is more vulnerable to overharvest and inbreeding. We respect the Board's role in determining allocative issues, but the minimum viable population of these wolves is not an allocative question, or one that should be made on feelings or public opinion. It is one that must be determined by scientific and TEK review. If the agency is unwilling to provide a recommendation, we encourage the Board to ask questions, like "what is the minimum number of wolves that could ensure enough genetic diversity for a healthy population?" ; "what percentage of wolves could be taken from this population each year to maintain that genetic diversity?" ; "What other factors, aside from human harvest, contribute to wolf mortality?" to determine a biologically responsible minimum population objective.
- The Board has a depth of knowledge about a diversity of wildlife populations and issues but they are not biometricians capable of synthesizing and modeling years of Unit 2 wolf population data to determine the minimum viable population and appropriate population objectives for Unit 2 wolves.

## **Why is the proposal important**

- In conjunction with AWA Proposal 45, which requests a change to the wolf population objectives for Unit 2, this proposal would allow the Department to initiate the steps to set up a

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research project to determine the appropriate minimum viable population goal.



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- At a public hearing in Prince of Wales on November 9th, 2021, the Department indicated “new genetic data raises questions about genetic diversity to prevent inbreeding” in Unit 2 and that the agency was keeping the trapping season short (one month) because, “the population objective might not be genetically sustainable.”
- Time is of the essence to take immediate steps to ensure a viable and sustainable wolf population is protected in Unit 2. The consequences are high given the species could be listed as threatened and endangered.

# Alaska Wildlife Alliance comment Proposal 49



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

To develop a conservative and precautionary population estimate to ensure a sustainable wolf population is maintained in Unit 2.

## **What is the Problem**

Current population estimates have been extremely variable and their accuracy questionable.

## **Real Examples of how this would adjust population estimates**

- In 2020 the pre-season population estimate was 386 with 95% confidence limits of (321-472). If this proposal was adopted, the pre-season population estimate the Department would have adopted to set their season length would have been 321, which is 56 fewer than the point estimate of 386.
- In 2021 the pre-season population estimate was 286 with 95% confidence limits of (216-332). If this proposal was adopted, the pre-season population estimate the Department would have adopted to set their season length would have been 216, which is 52 fewer than the point estimate of 268.

## **Why is the proposal important**

- This population is very vulnerable and currently being evaluated by the U. S. Fish and Wildlife Service to determine if it will be listed as a threatened or endangered species. This is the third time this population has been submitted for listing. Hence, it is appropriate to take a very precautionary and conservative approach when identifying the initial population size that will form the bases for establishing harvest seasons.
- The Department is still refining their population estimation models and techniques. There have been noticeable swings in population estimates and the confidence intervals surrounding the estimates over the past 4 years. As the Department, their partners, and harvesters continue to gather important population data, the stability of estimates will hopefully improve.
- Until the Department refines their models, sample collection standards, etc. it is appropriate to be precautionary on identifying the baseline population number from which annual management will be based.

# Alaska Wildlife Alliance comment Proposal 50



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

To establish the best pre-season wolf population estimate so an accurate wolf harvest quota can be established annually

## **What is the problem**

- The current pre-season population estimate calculated by the Department overestimates the wolf population because it assumes that all habitat in Unit 2 has equal ability to support wolves.
- Most outer islands in Unit 2 likely have no wolves as they are not accessible by wolves or have no food to support wolves. They likely cannot support the same density of wolves as those found on Prince of Wales Island.
- Extrapolating wolf density estimates from the most productive wolf habitat (POW = 60% of Unit 2) to the remaining 40% of the Unit, that are primarily islands, is problematic and results in an inflated population estimate for Unit 2. Estimates of the wolf population for Unit 2 are based on samples almost exclusively from POW (99% of samples come from POW). There is little sample data (<1%) from islands to know if they are occupied and at what density.

## **Example Scenario for Unit 2**

- Assuming all lands in Unit 2 can support wolves equally:
  - The State estimates there is 1 wolf per 1,000 acres in Unit 2 based on their research.
  - Entire Unit 2 lands = 500,000 acres
  - Pre-season population estimate for GMU 2 is 500 wolves (500,000 acres/1,000 acres per wolf = 500 wolves).
- Assuming all lands in Unit 2 cannot support wolves equally and only POW lands are suitable wolf habitat.
  - The state estimates there is 1 wolf per 1,000 acres in Unit 2.
  - Only POW (300,000 acres) is suitable wolf habitat
  - Pre-season population estimate for GMU 2 is 300 wolves (300,000 acres/ 1,000 acres per wolf = 300 wolves).
- Assuming that all the islands in Unit 2 can support wolves automatically results in a situation that overestimates the pre-season population (in this example by 200 wolves) and thus creates the immediate potential for an overharvest of the number of wolves available for harvest.

- Given the vulnerable state of the Unit 2 wolves it makes sense to take a more conservative approach to estimating the pre-season population.
- For another example, we would not extrapolate the average population density in Anchorage to Glennallen to determine Glennallen's population.



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### **Why this Proposal is Important**

- This proposal corrects the potential to overestimate the pre-season wolf population by limiting the pre-season population estimate to only lands that can actually support wolves.
- Not all lands in Unit 2 support wolves equally, and creating a population estimate that assumes otherwise is inappropriate and puts the Unit 2 wolves of overharvest.
- The Department has very limited data from harvest records to justify outer islands are occupied by wolves in the same density at Prince of Wales. They have no data within GMU 2 that justifies their assumption that wolf densities on the outer islands are similar to that on Prince of Wales.



# Alaska Wildlife Alliance comment Proposal 51



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

Provide a transparent wolf harvest framework in GMU 2 that will ensure a sustainable wolf population and provide harvesters with a predictable harvest quota and reasonable reporting requirements.

## **What is the problem**

- The current management framework adopted by the Board of Game (Board) in 2019 cannot adequately and predictably control wolf harvest as it relies only on controlling season length to control the number of wolves harvested. Because of this, the Alaska Department of Fish and Game (Department) has modified its approach to setting the wolf season length since 2019 to shorten seasons based on internal discussions and facts that are announced in the fall when they establish the final season length. The Department is concerned with potential overharvest and subsequently is not following the 2019 Framework passed by the Board.
- Under the current 2019 Framework there is no harvest quota/limit established for the pre-season and thus hunters/trappers have no idea how many wolves they can harvest in the season. Hunters and trappers are provided a set season length that is announced early fall, based on the recent preseason population estimate and internal Department discussions.
- The Department has virtually no idea how many wolves might be trapped per season regardless of the season length they set. The number harvested in a season will depend on weather, number of trappers and number of hunters pursuing wolves. The State does not require wolf trappers or hunters to pre-register so they have no idea of the effort that may occur during that season.
- There is no Quota (limit) “publicly announced” on numbers of wolves that trappers can take although they are required to call in a wolf harvest within 7 days and seal the animal within 15 days. Hunters can take 5 wolves per season with similar call in and sealing reporting requirements as trappers.
- The Department is not following the 2019 framework that is supposed to set a season length based on the pre-season population. Why? The Department knows the current framework does not work to maintain a sustainable wolf population and thus have adopted an internal management scheme that is based on an unknown framework. The AWA is thankful to see the more conservative seasons, but greater transparency is needed for both trappers and non-trappers.

## **Example Scenario for Unit 2**

- In 2019 the Board adopted a new Management scheme (Proposal 43) for wolves in Unit 2 and established a fall Unit 2 wolf population objective of 150–200 wolves.

- The new framework relies on season length based on pre-season population estimates to determine the length of the season.
  - If the population is 100 or below = no season
  - Population of 100-149 = up to 6 week season;
  - Population 150- 200 = up to 8 week season,
  - Population >200 = up to 4 months.
- The framework does not use in-season harvest data nor does it set a harvest quota like the old framework.
- 2019 Season: The pre-season population estimate was 187 wolves (2018 fall estimate). When the population estimate is above 150 the 2019 framework allows for up to an 8 week season and thus an 8 week season was allowed. An unsustainable harvest of 165 wolves happened in 2019.
- Season 2020: The pre-season population estimate was 316 (fall 2019 estimate). The trap season was set conservatively from Nov. 15- Dec 5 due to the 2019 season unsustainable harvest. Hunting was allowed Dec 1-5. Technically the 2019 management framework would have allowed for up to a 4 month season. 68 wolves were harvested in 2020.
- Season 2021: The pre-season population estimate was 386 (fall 2020 estimate). Technically this would allow for up to a 4 month season based on the original 2019 framework. However the State wanted to take a more conservative approach based on the uncertainty of former population estimates and set the season from Nov 15- Dec 15. 66 Wolves were harvested.
- Season 2022. The pre-season population estimate was 268 (fall 2021 estimate). Based on the original framework this would have permitted up to a 4 month season. However, the State announced a one month trapping season from Nov 15-Dec 15. The number of wolves harvested has not been announced.



**PC3**

### **Why this Proposal is Important**

- The current management framework adopted by the Board in 2019 is not being followed because it does not work. The Department has discretion to set a season “up to” the maximum amount, but the factors going into their determination are a complete mystery.
- There is not a transparent process for the trappers, hunters or public to follow- the Department is managing based on internal discussions and data.
- AWA Proposal 51 speaks to the management framework only, and adopts the same method that was used to manage wolves in Unit 2 from 1997 through 2018. Returning to that method, with the benefit of annual population estimates, a population objective, more convenient in-season reporting requirements, and a transparent public process represents a significant improvement over the current system.
- This proposal provides a path forward to a more transparent method of informing how wolf management can be improved by setting quotas based on the best available population estimates. It also ensures data is reported in a timely manner in-season so the quota may not



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be exceeded, or exceeded to a minimal extent. This provides conservative but transparent forward framework to manage a very vulnerable species with hopes of keeping it off the endangered species lists.



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## Alaska Wildlife Alliance comment Proposal 52



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal.

### **Proposal Goal**

A harvest quota between 20% - 35% of the estimated population of wolves in Unit 2 is established by the Board of Game (Board) based on conservation concerns.

### **What is the problem**

- The Board and Alaska Department of Fish and Game (Department) have not established what percentage of the annual Unit 2 wolf population can be harvested each year so that the population remains sustainable into the future.
- Without developing a standard sustainable harvest level, the population may be overharvested leading to a population that is no longer sustainable and vulnerable to becoming threatened or endangered.
- The State has the data that has established the potential percentage of mortality that the wolf population can sustain which is 30- 35%. We recommend 20-35% until population models and harvest management is stabilized.

### **Example Scenario for Unit 2**

- If, for example, the Department determines the pre-season population estimate is 350 wolves in Unit 2 and hypothetically the Department population objective is to maintain a minimum 200 wolves to ensure a sustainable population. Thus in total no more than 150 animals should be removed (harvest (legal/illegal and natural mortality) from the population.
- If there is a standard range of harvest mortality established like 20-35% this would equate to human harvest allowed of between 70-122 wolves. Leaving a sustainable estimated population of 228 (350-122) to 280 (350- 70) animals. Given there is illegal harvest and natural mortality that will occur during the year the population post season and into the spring breeding period is likely lower but still within an acceptable limit of likely 200 animals entering the next harvest season.

### **Why this Proposal is Important**

- This Proposal provides flexibility for the Department in setting harvest quotas and predictability for the trappers and hunters on how quotas will be set each year. Transparency in the process is increased for all interested parties while ensuring a sustainable future population of wolves continues to reside in Unit 2.
- When the preseason population estimate is large enough to allow for a harvest of wolves providing a harvest quota range of 20-35% of the population allows the Department to be



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conservative (use a 20% quota) if the pre-season estimate is near the population objective or to be a bit more liberal (35%) if there appears to be a healthier population.

- This proposal links with Proposal 53 that requests that mortality factors beyond harvest are factored into the equation to create an overall more transparent, conservative, and predictable management framework to wolf management in Unit 2.



# Alaska Wildlife Alliance comment Proposal 53



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

An estimated unreported mortality rate of 35-50% shall be utilized in establishing an annual harvest quota of wolves in Unit 2 to ensure there is a continued sustainable wolf population in Unit 2.

## **What is the Problem**

- The current methodology ignores mortality resulting from natural and illegal harvest despite research indicating such mortality is happening.
- Ignoring that other mortality is happening beyond legal harvest results in less accurate population estimates and ultimately more instability when trying to maintain a sustainable wolf population objective.
- The legal take of wolves in Unit 2 underestimates the total mortality in the wolf population, and thus leaves the Department vulnerable to overharvesting a genetically distinct, isolated wolf population. Wolves die from any number of causes, including legal harvest by trapping and hunting, wounding loss, illegal harvest (wolves killed but not reported or sealed per regulations), and natural mortality.

## **Management Example**

Preseason population estimate is 285 wolves. The Board's sustainable post- harvest season Population Objective is 200 wolves.

- Current method, if the Department sets an actual harvest quota as recommended by AWA and the Department only accounts for harvest mortality:
  - Department allows for 35% (harvest quota) of 285 animals to be harvested  $.35 \times 285 = 100$  animal harvest allowed. At the end of the season, the harvest quota of 100 animals is met and there are now 185 animals ( $285-100=185$ ). This is below the objective sustainable population the Department wanted of 200 and they have yet to account for any other mortality that may happen in winter and next year. Thus, the population is starting below the sustainable population objective of 200 going into the winter and breeding season just based on legal harvest. IF additional mortality (illegal and natural) of 35% happens, another 65 animals are lost ( $.35 \times 185=65$ ;  $185-65= 120$ ). There are now only 120 + animals that may be available preseason the following year. New pups will be born but may not allow the population to rebound to the population objective of 200 animals.
- A better approach:
  - The Department gets a preseason fall estimate of 285 wolves. They account before setting the legal harvest quota that there may be a 35 % mortality that may occur due to illegal harvest and natural mortality going into the next year = 100 animals. Subsequently the next year's population may already be as low as 185 ( $285-100$ ) animals just based on non-legal harvest and natural mortality. They know there will likely be some new pups born but accounting for the non-harvest mortality up

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front they may opt to not have a season or they may opt to have a very low harvest quota to ensure they keep the population at their 200 objective level.



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### **Why is the proposal important**

- The Department argues that the preseason population estimate they provide each year accounts for all mortality. This assumption is flawed in the sense that we know how many animals there are in the preseason (at one point in time), but when you set your fall harvest quota you do not account for other mortality that will also influence the breeding population and ultimately your next preseason population estimate.
- The Department knows there are both new pups and other mortality happening in a population. Why would the Department not account for other mortality to create a better management framework and overall model? The research has been done and there are estimates of non-harvest mortality that could be used to improve the management of this population.
- This proposal echoes a recommendation made by the Interagency Wolf Technical Committee that recommends that harvest quotas continue to be adjusted annually for unreported kill.

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## Alaska Wildlife Alliance comment Proposal 54



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

### **Proposal Goal**

- Provide a potential alternative spatial methodology for managing wolves by using area closures
- Task the Department and the U.S. Forest Service with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas are large enough to be buffered from trapping pressure and have suitable habitat resources to maintain wolf packs.

### **What is the Problem**

The Board and the Department have wrestled with creating a sustainable wolf management scheme in this Unit for years, so we offer a different approach for consideration. This system may sustainably manage wolves in GMU 2 and maintain the genetic diversity

### **Example Scenario**

If the wolf population can sustain ~30% annual mortality, then open ~ 1/3rd of the unit to wolf trapping each year and close the remainder. The areas subject to closure, and those that are open, could be established permanently by the Board of Game, or rotated on a long-term schedule.

### **Why is the proposal important**

- This proposal simply provides another mechanism for the Department to evaluate for the management of unit 2 wolves.
- The proposal relies on spatial closure to control potential harvest and increase the ability to maximize genetic diversity in the population that is currently showing signs of stress.
- Partial closures of game units have proved effective in protecting wildlife populations in AK and elsewhere.