

Alaska Wildlife Alliance comment on Proposal 194

On behalf of our Alaska-based membership, Alaska Wildlife Alliance submits the following comment in support of Proposal 194. This proposal appears responsive to the inadequate regulatory regime in GMU 2 which led to a dramatic overharvest of wolves in the 2019-20 season, and a higher than average harvest in the shortened 2020-21 season.

We understand that the management regime for GMU 2 wolves, prior to the change precipitated by Proposal 43 in 2019, left ADF&G in a difficult situation. The department was tasked with maintaining a “sustainable” wolf population without clear population objectives. While the 2019 management shift provided ADF&G with clear wolf population goals, it removed the mechanism the department had to track wolf harvest during the season (in-season sealing), thereby removing its ability to accurately monitor wolf harvest until after an overharvest occurred. This was the case in the 2019-20 season. As ADF&G states in Proposal 194, “accurate population estimates are key to setting annual season length and maintaining the population within the objective range for this contentious population.” We believe that rapid, yet reasonable, harvest reporting is essential to accurately monitoring population levels during the trapping season.

Our primary concern is that the existing management regime for wolves in GMU 2, which relies exclusively on season length as a mechanism for ensuring sustainable harvest, is inconsistent with constitutional requirements of sustained yield. We are pleased to endorse this proposal, with suggested amendments, as a remedy to the flawed regime currently in place.

Suggested amendments:

- Harvest report within 48 hours and sealing within 5 days (as adopted in GMU 1C)
- Traps must be lifted 24-48 hours after a season or emergency closure

While the proposed 7-day sealing period is far superior to the current 30-day sealing period, we continue to urge the Board to adopt a wolf management regime for GMU 2 similar to that of GMU 1C, Douglas Island. There, a trapper who takes a wolf in the management area must report the harvest to ADF&G Division of Wildlife Conservation in Douglas within 48 hours of taking the wolf and present the hide for sealing within 5 days.

Given that the Alexander Archipelago wolves in GMU 2 are currently undergoing an Endangered Species Act petition review, we encourage the Board to adopt the management regime already in place in GMU 1C for

application in GMU 2 to ensure constitutionally provisioned sustained yield. We also urge the Board to amend the proposal to add language that traps must be lifted 24-48 hours after the closing of the season or an emergency closure. This is a prudent and efficient management tool that will ensure proper allowable harvest and avoid exceeding sustainable yield principles mandated by the Alaska Constitution.

While the focus of our involvement in this issue revolves around sustained yield of wolves, the local concern over deer populations must also be acknowledged. Many of Alaska Wildlife Alliance's members, Board, and staff are hunters. We support Alaskans' right to harvest of game and fill their freezers, especially those in rural communities such as on Prince of Wales. However, the public assumption that wolves are responsible for deer diminishment in GMU 2 must be candidly discussed and dealt with according to biological and legal requirements.

In the Board discussion of Proposal 43 in 2019, then Chairman Spraker asked Mr. Schumacher whether ADF&G shared the public's view that deer populations in GMU 2 are declining because of wolves.

Mr. Schumacher responded:

*"The Fish and Wildlife Service went through their species status assessment for wolves, and they did some modeling and looked at long-term habitat condition and came up with, that the long term trend is that **Unit 2 will support fewer deer in the future, primarily due to forest management conditions.** What we've seen here are short term changes which seem more likely due to something else, **whether that's wolves, whether we've had, in the last 7 or 8 years record deer harvests,** that could play some role in it. We can't really speculate but it would be accurate to say that people on the island generally attribute it to the presence, or increased number, of wolves." [5:34:04.](#)*

Mr. Schumacher's response expressly and implicitly acknowledges the underlying tension here – scientific and legal requirements for wildlife management, and the pressures of local residents to harvest deer in large quantities, even as deer habitat has been diminished by timber harvest. The situation has unfortunately resulted in the scapegoating of wolves, where demand for their culling is inconsistent with constitutionally mandated sustained yield purposes.

At least in an indirect manner, Proposal 194 addresses sustained yield provisions. From a practical perspective, the proposal gives ADF&G responsible mechanisms that will give the department necessary game management tools to stay in compliance with constitutional requirements. We hope the Board considers and adopts this proposal as a step in the right direction of creating an active and appropriate management regime for GMU 2 that ensures the sustainable harvest of wolves.