

# American Society of Mammalogists

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Theo Matuskowitz  
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2 August 2017

Dear Mr. Matuskowitz:

On behalf of the American Society of Mammalogists (ASM), the world's oldest and largest professional society devoted to the scientific study of wild mammals, I am sending you a position letter to be included among comments to **WP18-04** (2018-2020 Wildlife Proposals, page 5 - <https://www.doi.gov/subsistence/proposal/current>), a wildlife proposal to increase harvest limits on wolves in Unit 2, Southeast Federal Subsistence Resource Region. We strongly support the conservation and responsible use of wild mammals based on current, sound, and accurate scientific knowledge. The Society has a long history of reviewing issues related to mammalian conservation, and where appropriate, adopting positions on issues concerning the conservation and responsible management of mammals and their habitats based upon our scientific expertise.

The ASM is concerned about the conservation of the Alexander Archipelago wolf (*Canis lupus ligoni*), a taxon of concern in southeastern Alaska since the 1980s (Person et al. 1996, USFS 1997, 2008; USFWS 1997; USFWS 2014). This endemic subspecies is geographically, morphologically, and genetically distinct from other gray wolves (*C. lupus*), is unique to the North Pacific Coast (Cook et al. 2006, MacDonald and Cook 2007, Cook and MacDonald 2013), and constitutes a significant portion of the genetic diversity of *C. lupus* in North America (Goldman 1937, 1944; Person et al. 1996; Weckworth et al. 2005, 2010, 2011, 2015; Munoz-Fuentes et al. 2009; Cronin et al. 2015). The Alexander Archipelago wolf (*Canis lupus ligoni*) was recently considered by the U.S. Fish & Wildlife Service (USFWS) for protection under the Endangered Species Act (ESA) as a threatened or endangered species, with a positive 90-day finding that listing "may be warranted" (USFWS 2014). Although a final finding of "not warranted" was issued in 2015 (USFWS 2015a), the Final Status Assessment concluded that "Nonetheless, the persistence of the GMU2 population is desired and requires careful

management actions and decisions to ensure its future health” (USFWS 2015b). One of the areas of greatest conservation concern for *C. l. ligoni* is the population located on Prince of Wales Island. This particular population is geographically and genetically isolated from other populations of *C. l. ligoni* (Weckworth et al. 2005), and is one of the most threatened of any wolf population.

Specifically, the ASM is concerned about the Southeast Alaska Regional Advisory Council’s proposal to increase the annual harvest rate to “30% of the most recent unitwide, preseason population estimate” because, unlike the Council (response to question 4, What impact will this change have on wildlife populations?), we already suspect conservation concern is justified for the following reasons. Based on radio-telemetry (Person et al. 1996), the Prince of Wales Archipelago (POWA) wolf population was estimated to be 250–350 in the mid-1990s; however, a decline in this population was noted beginning around 2008 (Person 2010). In 2010, the Alaska Dept. of Fish & Game (ADFG) resumed fieldwork that included radio-telemetry and other census methods in central POWA, and over the next few years documented few wolves and little wolf sign (Person 2010). In 2013, ADFG documented 80% mortality within their central POWA study area (Person and Larsen 2013). Since that time, even with reduced harvest quotas to 20%, midrange population estimates of POWA of 89 individuals for fall 2014 (ADFG 2015b) and 108 individual for fall 2015 (ADFG 2016) are very low. Arguably, increasing the harvest rate to 30% would facilitate further declines and increase risk of extirpation.

Telemetry studies have shown the impact of illegal harvest on this population to be substantial, representing as much as 37% of the total known mortality between 2012 and 2015 (Roffler et al. 2016: Table 4). Moreover, the existing regulation of allowing hunters/trappers 2 weeks to report legal wolf harvests can be ineffective in curtailing legal overharvests and thus significantly contribute to unexpected annual mortality. Indeed, because of the delay that can occur between documenting total legal harvest and subsequent emergency closure, 29 wolves were “legally” harvested in 2016 (ADF&G, personal communication) when the legal harvest quota had been established at 11 (ADF&G-Tongass National Forest News Release, 25 August 2016). The additive impact of illegal and legal overharvests, and the failure to account adequately for those effects in establishing harvest quotas is likely responsible for recent population declines.

Human access provided by the high density of approximately 4,500 km of logging roads in POWA is directly related to high wolf mortality in the area and particularly the illegal take of wolves (Person and Russell 2008; Person 2013, 2014; Wolf Technical Committee 2017). The primary prey of wolves is Sitka black-tailed deer, and the perceived competition between hunters and wolves for deer is one cause for the unsustainable human take of wolves on POWA (Farmer and Person 2000; Brinkman 2009, Brinkman et al. 2009; Person and Russell 2008; Person 2013, 2014). Whereas this competition already is a mortality factor for wolves, deer numbers are expected to plummet as a result of the “succession debt” from past, current, and planned logging, with former old-growth forest winter deer habitat becoming essentially of no value to deer at least 30 years after logging (Person and Brinkman 2013) and possibly for as long as 150 years after logging (Hanley et al. 1984). This decline in prey, regardless of wolf harvest, will itself pose a significant threat to POWA wolf persistence.

Despite this evidence, the U.S. Forest Service (USFS) claims that further increases in the density of logging roads and further losses of the old-growth habitat preferred by deer to contemporary logging are not problematic for *C. l. ligoni*. This USFS perspective is exemplified by the 2016 revision of the Tongass Forest Plan, which promotes additional harvest of old-growth forests with construction and renovation of logging roads. Indeed, the Big Thorne timber project in central Prince of Wales Island, the agency's largest timber sale on the island in over 20 years, will take 148.9 million board feet of timber from 8,500 acres of logging units in old-growth forest (USFS 2013). ASM strongly disagrees with this claim and with the renewed policy of old-growth logging and expansion of logging roads (see ASM 2015, USFS 2016, Wolf Technical Committee 2017). Moreover, in July 2017 the USFS issued for public comment a proposed action for a multi-faceted project on Prince of Wales Island (the POW LLA Project) that includes an additional 200 million board feet of logging of oldgrowth forest (USFS 2017).

In addition, the interagency report "Wolf habitat management program: GMU2 recommendations" released in March 2017 has several problems including that old-growth forests receive minor attention, but instead there is an emphasis on "restoration" of young growth forests for deer habitat. Sections of this document on wolf mortality, road management and den management should be improved. For example, road management is focused primarily on closures rather than emphasizing the need to not add new roads to the already high density of roads in GMU2.

In response, the American Society of Mammalogists calls upon (1) the Federal Subsistence Board to reject the proposed increase in annual harvest rate threshold to 30%; (2) The Alaska Department of Fish & Game to issue an emergency order (EO) closing Game Management Unit 2 (GMU2) to the hunting, trapping, or other take of wolves until the wolf population there can be verified to exceed 200 animals on the low end of the estimate range; and (3) the U.S. Forest Service to cease the construction of new roads and clearing of old growth forests on its lands within GMU2, including those of the Big Thorne project.

In summary, we believe that the circumstances as outlined above require immediate action on the part of the Federal Subsistence Board, ADFG, and USFS to conserve this unique subspecies of the gray wolf, including the wolves on Prince of Wales Island. The ASM greatly appreciates your close consideration of our comments and suggestions on this very important issue and stands ready to lend our collective expertise to help you resolve this issue.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Robert Sikes". The signature is fluid and cursive, with the first name being the most prominent.

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President,  
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