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HAND DELIVERED

August 27, 2020

Alaska Board of Game
Alaska Department of Fish & Game
Juneau, Alaska 99801

Attention: Kristy Tibbles, Executive Director

Re: Petition to Close Wolf Hunting & Trapping in Game Management Unit 2 By Emergency Regulation

To the Alaska Board of Game:

I represent Joel Bennett and the Alaska Wildlife Alliance (hereafter “Bennett” and “Alliance”). Bennett is a resident of Alaska with a demonstrated interest in wildlife conservation. Bennett has spent considerable time over the last 50 years engaged in commercial activities filming wildlife in Alaska, including wolves. The Alliance is an Alaska entity with an interest in protecting and preserving wildlife in Alaska according to mandatory sustained yield principles.

Bennett and the Alliance petition for an emergency regulation closing Game Management Unit 2 in Southeast Alaska to hunting and trapping wolves based on existing trapping and hunting practices that are obviously having a catastrophic negative impact on the wolf population in Game Management Unit 2.

SUBSTANCE OF THE REGULATION REQUESTED

Closure of the 2020-2021 wolf hunting and trapping season on Prince of Wales and associated Islands (Game Management Unit 2).

BASIS FOR THE REQUEST

In essence, this petition for closure of wolf trapping and hunting is made because the most recent biological data available indicates that the present wolf population estimate in Game Management Unit 2 will not sustain any additional harvest, according to the Wolf Harvest Management Strategy (RC 011), and the principles of sustained yield management.

On March 20, 2020, Alaska Department of Fish & Game reported 165 wolves were killed from both hunting and trapping over a two-month season in Game Management Unit 2. This kill rate nearly exceeded the most recent department population estimate of 170 wolves (establishment of the population figure of 170 wolves was set by the department to be within a range of 147-200 wolves), believed to be living in relevant unit. In addition, an unknown number of additional wolves killed in this geographical unit are not reported and are therefore not included in wolf kill total. As a result, to avoid overharvest and significant damage to the population of wolves in Game Management Unit 2, no additional harvest of wolves should be permitted in this unit for the foreseeable future.

The wolf population in Game Management Unit 2 is obviously perilously low based on available data from the Alaska Department of Fish & Game. Even if additional 2019 wolf population data becomes available, it will be dated, gathered as it was before the high harvest of Fall/Winter 2019-2020, a culling that is problematic. It is inconceivable that review of the wolf population data from 2019 (surveyed prior to the 2019-2020 harvest season), would indicate a population in excess of approximately 400 wolves within Game Management Unit 2, the only conceivable wolf population justification for allowing the massive wolf kill rate that took place in the Fall/Winter of 2019-2020. Accordingly, given the known exceedingly high harvest rate last hunting and trapping season and the apparent lack of any data gathered after the 2019-2020 wolf trapping and hunting season for Game Management Unit 2, there is no basis for continuing the unsustainable killing of wolves in Game Management Unit 2.

In January 2019, the Alaska Board of Game endorsed the Alaska Department of Fish & Game's revised harvest management plan, essentially replacing a harvest quota system with a harvest based on a population objective. This new wolf harvest management regime was based on population thresholds calculated to trigger

changes in season length.¹ Based on this management plan and the implicit population objectives embedded in the plan pertaining to the lowest acceptable population threshold for maintain a viable wolf population in Game Management Unit 2, a population of less than 100 wolves in the unit is insufficient to support an additional wolf harvest in the 2020-2021 trapping and hunting season. Under the wolf management plan adopted by the Alaska Board of Game and binding on the Alaska Department of Fish & Game, no further wolf harvest in Game Management Unit 2 is possible for the foreseeable future. As a consequence of the very high harvest rate of wolves in Game Management Unit 2 and given the obvious application of the criteria in the strategy in RC 011, an emergency closure of wolf hunting and trapping in the impacted unit must be adopted.

It should also be noted that before the high harvest last season triggered this need for emergency action, the wolf population on Prince of Wales Island and the associated nearby islands in Game Management Unit 2 were already under considerable stress. The wolves in Game Management Unit 2 are an isolated population with little or no immigration and subject to large-scale habitat alteration through logging and associated road construction. Hunters and trappers seeking to harvest wolves in this unit have benefited from increased access by using the network of roads constructed for timber access as well as by boat along the shoreline. Finally, insufficient genetic diversity through inbreeding is an additional concern with the extremely low wolf population in GMU 2.

This petition is being submitted because there is no Board of Game meeting scheduled before the 2020-21 wolf hunting and trapping season begins. As a result, there is no obvious way to submit a proposal for a regulation change during the normal board process. Without an emergency closure, a Fall/Winter 2020-21 hunting and trapping season will commence well before the next scheduled Board of Game meeting which is scheduled to begin on January 21, 2021.

Unless the hunting and trapping season is closed for 2020-2021 for Game Management Unit 2, the wolf population in this unit which is already precipitously diminished and almost certainly significantly below the threshold levels mandated by the current management regime will be further reduced, placing the wolf population in Game Management Unit 2 in extreme danger, a course of action that deviates from constitutional mandates and inconsistent with sensible game management standards.

¹ ***Unit 2 Wolf Harvest Management Strategy - RC 011.***

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AUTHORITY OF THE AGENCY TO TAKE THE ACTION REQUESTED

5 AAC 96.625 (authorizing a petition for an emergency regulation under the provisions of AS 44.62);

AS 16.05.270 (providing for a delegation of regulatory authority from the Board of Game to the Commissioner of Fish and Game). See also, Standing Delegation of Authority to Commissioner Regarding Petitions for Emergency Regulations (2015-208-BOG).

AS 16.05.060 also provides independent authority to the commissioner to open or close seasons by Emergency Order, when circumstances require.

This matter warrants prompt attention and action by the department. Please contact me if you have questions about this petition.

Very truly yours,

Joseph W. Geldhof

Copy J. F. Bennett
Alaska Wildlife Alliance