



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Fish and Game**

OFFICE OF THE COMMISSIONER  
Headquarters Office

1255 West 8<sup>th</sup> Street  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Main: 907.465.4190  
Fax: 907.465.6142

September 8, 2020

Mr. Joseph W. Geldhof  
2 Marine Way, Ste. 207  
Juneau, Alaska 999801

Dear Mr. Geldhof:

Thank you for your August 27, 2020, petition on behalf of Alaska Wildlife Alliance and Mr. Joel Bennett to the Board of Game concerning RY2020 wolf hunting and trapping seasons in Game Management Unit (GMU) 2. Under board policy 2015-208-BOG when petitions are submitted to the board outside of regularly scheduled meetings the board has delegated to the commissioner of the Alaska Department of Fish and Game the authority to determine whether an emergency under 5 AAC 96.625(f) exists. The Commissioner has 30 days to issue a finding. The purpose of this letter is to relay my decision that we cannot find an emergency at this time.

The State of Alaska GMU 2 wolf trapping and hunting seasons, by regulation, will not open until November 15 and December 1, respectively. Given that this is the second week of September there is no imperative need to act within 30 days of your petition because the seasons will not be open. I would like to note that ADF&G already has Emergency Order authority to close seasons without additional action by the Board of Game.

In 2019 the board established a fall population objective of 150-200 wolves in GMU 2. The GMU 2 Wolf Harvest Management Plan, which was endorsed by the Alaska Board of Game, GMU 2 Advisory Committees, Southeast Regional Advisory Council, and the Federal Subsistence Board, provides guidance on harvest season length relative to the most recent population estimate with the goal of maintaining the fall population within the objective range. Under the management plan the season will be closed when the fall population is believed to be fewer than 100 wolves. Further, the U.S. Forest Service, the delegated federal subsistence hunting and trapping manager, has closed the federal wolf hunting season in GMU 2 through October 30; the normal opening date for the federal GMU 2 wolf hunting and trapping seasons are September 1 and November 15, respectively. Consequently, there can be no legal harvest of a Unit 2 wolf before October 31<sup>st</sup>.

The most recent (fall 2019) population estimate is a key factor in setting the fall 2020 season length as detailed in our management plan. I have been advised the Southeast Regional office recently received the lab results from hair samples collected during fall 2019. We anticipate the fall 2019 estimate will be available in late September or early October and will reference that estimate when determining the appropriate fall 2020 harvest season length.

Under 5 AAC 96.625(f), emergencies are held to a minimum and rarely found to exist. While we have not found an emergency, if two members of the board disagree, they can call a special meeting. Note that any regulations made at an emergency meeting would be enacted for 120 days. A subsequent special board meeting would have to occur to make the regulations permanent.

Thank you for your interest in GMU 2 wolves, and all of Alaska's wildlife, and for taking the time to express your concerns.

Sincerely,



Doug Vincent-Lang  
Commissioner

cc: Eddie Grasser, Director, Division of Wildlife Conservation  
Kristy Tibbles, Executive Director, Boards Support  
Stosh Hoffman, Vice Chair, Alaska Board of Game  
Larry Van Daele, Alaska Board of Game  
Jerry Burnett, Alaska Board of Game  
Orville Huntington, Alaska Board of Game  
Al Barrette, Alaska Board of Game  
Jake Fletcher, Alaska Board of Game  
Lynn Keogh, Alaska Board of Game