

## Ketchikan Area – Unit 2

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**PROPOSAL 12- 5 AAC 84.270. Trapping seasons and bag limits, and 85.056. Hunting seasons and bag limits for wolf.** Reduce the bag limit for trapping and hunting wolves in Unit 2, require locking tags and implement registration requirements as follows:

1. Issue locking tags that must be placed on the animal at the kill site.
2. When taken by trap or snare, only the person whose name is on the trap or snare may tag that animal, and they must be present at the time when the animal is taken.
3. All trap site locations must be registered with the state. (Similar to bear bait stations. This will allow law enforcement a chance to enforce the rules).

I feel that a total personal bag limit of about five wolves taken by hunting and trapping combined would be appropriate although the state could use past harvest data to come up with a number that would likely hit the season quota with a full season of participation time.

**What is the issue you would like the board to address and why?** To impose a personal bag limit on wolves. Current plans are to reduce even further the total harvest limit for Unit 2. This will likely result in a very short season. Many of the hunters and trappers in this unit enjoy pursuing wolves as a winter activity and are satisfied if they only take a couple of wolves per year. To them, it's more about the time spent out pursuing these animals. With a few trappers taking the majority of the quota this enjoyable winter activity will not likely last all winter for most of the recreational hunters and trappers.

**PROPOSED BY:** James Bauers

(EG-C14-287)

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**PROPOSAL 13 - 5 AAC 92.008. Harvest guideline levels.** Change the management level for wolves in Unit 2 to include all causes of mortality for wolves as follows:

Change 5 AAC 92.008(1) to read: “**wolves: (A) the department shall manage the take of Unit 2 wolves so that the total annual human take from all causes (reported, illegal and wounding loss) does not exceed 30% of the Department’s minimum estimate of the unit-wide fall population; and (B) a natural mortality of up to 8% is already accounted for in the 30% limit, but if the department determines that natural mortality may be exceeding that level, it shall adjust its management accordingly.**”

**What is the issue you would like the board to address and why?** This proposal is specific to Unit 2 and concerns Alexander Archipelago wolves, an endemic subspecies (*Canis lupus ligoni*) in Southeast Alaska and the only wolf subspecies known to be found or reproduce there. 5 AAC 92.008(1) states that for Unit 2 wolves, “annual harvest ... should not exceed 30%” of the ADF&G's pre-season population estimate. (Emphasis added).

Mortality of Unit 2 wolves from all causes and their substantially declining population have been ongoing issues. In managing wolf populations that are in decline it is important that all causes of mortality be taken into account, including natural mortality, reported harvest, illegal take, and wounding loss. In combination, regulation 5 AAC 92.008 itself and the ADF&G's application of that regulation in managing Unit 2 wolves take into account only the number of legally harvested wolves and the natural mortality. This management has, to date, ignored illegal take and wounding mortality. Past radio collar studies in Unit 2 indicate that illegal take is likely on par with reported legal harvest; that is roughly 50% of the total take. ("The Alexander Archipelago wolf: a conservation assessment", Person et al. 1996; "Correlates of mortality in an exploited wolf population", Person & Russell 2008; "Developing a method to estimate abundance of wolves in Southeast Alaska, progress report", Person & Larson 2013). Recent research by ADF&G indicates that total annual mortality may now have reached 80% of the population, at least in the central part of Unit 2 (Person & Larson 2013).

For Alexander Archipelago wolf populations it has been estimated that if total mortality exceeds 30-35%, a population decline will result (Person et al. 1996), more recently revised to an estimated threshold of 38% (Person & Russell 2008). Natural mortality is estimated at 5-8% of the population (Person et al. 1996). Therefore, the 30% harvest cap in 5 AAC 92.008 has allowed adequately for natural mortality, 8%.

However, in setting its harvest cap for Unit 2 wolves (60 wolves in recent years) ADF&G has failed entirely to take into account the known substantial illegal take or any wounding loss. For 2013-2014 ADF&G based its management on a population of 200, arbitrarily picked from ADF&G's estimated range of 150-250. It picked 200 simply because it is the midpoint of the range (Personal communication with ADF&G). Then, ADF&G applied the 30% factor in establishing a "harvest" cap of 60 wolves, as measured by the number of sealed skins. An emergency order closing the season two weeks early was issued on March 13, 2014 when the reported harvest (sealed skins) had reached 52 wolves. The closure was effective six days later, at which time it was anticipated the reported harvest would reach 60.

This means that ADF&G construed the 30% cap in 5 AAC 92.008 to apply only to reported "harvest," while ignoring entirely the substantial telemetry-estimated illegal take. The arithmetic that demonstrates this is incontrovertible ( $200 \times 0.30 = 60$ ), and ADF&G has admitted this was the case.

Moreover, the Unit 2 population ADF&G used in its calculation (200) may have been an overestimate of the actual population, which ADF&G has estimated could be as low as 150. It is possible, however, that the population was less than 150 – no one knows, and ADF&G's field observations have shown scant trace of wolves in the substantial part of the unit it has investigated. (Recordings of the November 2010 Board of Game meeting; Person & Larson 2013; several other documents).

The word "harvest" in 5 AAC 92.008(1) has misled ADF&G concerning the crucial need to include illegal take and wounding loss in setting the harvest cap of Unit 2 wolves. Further, the regulation does not require management based on a conservative estimate of population. In short, the regulation is incapable of assuring sustainable management of a wolf population that is in

notable decline, and as written the regulation is misleading to the public as well as the ADF&G. Both shortcomings in the regulation (not explicitly incorporating illegal take and wounding loss, and not basing management on the minimum estimated population) need to be remedied.

**PROPOSED BY:** Greenpeace, Center for Biological Diversity and The Boat Company  
(EG-C14-320)

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**PROPOSAL 14 - 5 AAC 92.008. Harvest guideline levels and 5 AAC 92.130. Restrictions to bag limit.** Establish regulations in Unit 2 to allow for appropriate harvest levels and account for unrecovered harvest as follows:

**5 AAC 92.008. Harvest guideline levels.**

(1) wolves: the annual harvest of wolves in Unit 2 should not exceed **20** [30] percent of the unitwide, preseason population as estimated by the department;

**5 AAC 92.130. Restriction to bag limit.**

(h) In Unit 2, a wolf wounded by a person counts against that person's bag limit for the regulatory year in which the wolf is taken.

**What is the issue you would like the board to address and why?** In Unit 2, ADF&G currently manages wolf harvest at 30% of the estimated fall wolf population; emergency order authority is used to close the season when the harvest reaches the guideline harvest level (e.g., 60 wolves in RY2013). Currently, only wolves presented for sealing are applied to the annual guideline harvest level. This harvest level was the result of research conducted on Prince of Wales Island during 1991- 1995 and 2000 - 2004.

In studies of numerous wolf populations, human-caused mortality of approximately 28% has been shown to be sustainable. On Prince of Wales, it has been suggested that unreported harvest may be substantial. The ADF&G believes that reduced harvest is appropriate until updated population and harvest information become available and is therefore proposing to reduce the harvest rate in 5 AAC 92.008 from 30% to 20% of the most recent population estimate.

ADF&G will also seek to evaluate unreported human-caused mortality. Numbers of wounded, lost, or otherwise unaccounted wolves are difficult to estimate but have an effect on overall harvest. While it may be impossible to account for 100% of the previously unreported take, ADF&G believes that a more realistic number than is currently available can be attained through the cooperation of local trappers and hunters and with a mandatory reporting requirement for unrecovered wolves. In the past these animals have not been included in harvest totals because there was no mechanism to account for them (unlike those reported through the department's Furbearer Sealing Certificates).

When a trapper or hunter believes he/she has wounded a wolf with a firearm used for hunting; or detects evidence indicating a wolf has escaped from a trap, or removed a trap from a set location, the trapper/hunter shall report this animal to the department. Where there is an annual bag limit, wounded/lost wolves will count against the trapper and/or hunter's bag limit.

**PROPOSED BY:** Alaska Department of Fish and Game

(EG-C14-323)

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**PROPOSAL 15 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.** Allow trappers to take beaver in Unit 2 with a firearm as follows:

In means and methods, insert “the use of firearms” to take beaver in Unit 2.

**What is the issue you would like the board to address and why?** Allow the taking of beaver with a firearm. There are several of us in this unit that pursue river otter by shooting. Allowing shooting for beaver would allow those who prefer this method to trapping a chance to harvest beaver. Beaver populations are high enough that this additional take would not be significant. It would also aid in controlling beavers causing road damage.

**PROPOSED BY:** James Bauers

(EG-C14-288)

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