PROPOSAL 48

5 AAC 84.270. Furbearer trapping.
5 AAC 85.056. Hunting seasons and bag limits for wolf.
5 AAC 92.008. Harvest guideline levels.

Change the methodology for setting the population objective for wolves in Unit 2 as follows:

General authority, as applicable: 5 AAC 84.270(13), 5 AAC 85. 056(1); 5 AAC 92.008.

5 AAC 92.008 is amended to read:

The minimum population objective for wolves in Unit 2 shall be based on a biological population viability analysis, using available demographic data.

We recommend that ADF&G contract with a qualified researcher to conduct a population viability analysis for wolves in Unit 2 using available demographic data. From that research, ADF&G recommends a baseline population objective based on the results. This will ensure that the population objective considers genetic diversity (based on the agency's best available science), resilience to habitat loss or fragmentation, carrying capacity, and other biological factors.

What is the issue you would like the board to address and why? In the January 2019 Board of Game (BOG) discussion which set the population objective for wolves in Unit 2, the BOG adopted a spring population objective between 135-180 wolves. In the discussion record, the lower goal of the population objection (135 wolves) was derived by subtracting 40% of ADF&G's historic population point estimate. One hundred wolves was set as the lowest acceptable limit of wolves in Unit 2. This was because the BOG believed that there was a 40% maximum mortality that the wolf population could recover from year-to-year, as long as trappers do not take too many adults. The upper limit of the population objective was based on 20% of the low-end population estimate.

The population objectives were adopted by the board in 2019 in step with a new proposal to manage wolves by "population objective". Managing to a population objective is not a flaw, we simply have concerns that the minimum population objective (100 wolves) is inadequate to assure viability over the long term.

The department (ADF&G) excused itself from establishing a population objective, preferring, instead, to let local residents set it. The public has no way of knowing wolf carrying capacity, much less what number of wolves might be needed to maintain viability or to provide for a maximum sustained yield.

The decision to set 100 wolves as the minimum did not include a consideration of the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecking, susceptibility to rabies and disease; resiliency to harvest over 40%; or resilience to habitat fragmentation and loss from old growth logging. In fact, ADF&G conducted no population viability analysis to support the board's decision to set 100 wolves as the minimum acceptable level.

Since 2019, and in light of new genetic studies, it appears the minimum population number has been on ADF&G's mind. At a public hearing in Prince of Wales on November 9th, 2021, a representative from ADF&G stated that "new genetic data raises questions about genetic diversity

to prevent inbreeding" in Unit 2 and that the agency was keeping the trapping season short (one month) because, "the population objective might not be genetically sustainable."

There is no area within Unit 2 where a wolf pack is not exposed to legal and illegal killing. With no evidence of immigration into Unit 2 from surrounding management areas, a small residual population of 100 wolves could be feasibly extirpated, and risks a positive ESA listing decision.

In sum, even if the minimum number of wolves (100) currently set by the BOG is sustained, there are serious concerns that 100 is too few wolves to provide a viable population. If the population objective, particularly the minimum, does not consider the above-listed conservation considerations, the state risks violating sustained yield principles by not taking what the courts consider a "hard look" at variables influencing a resource's sustainability.

PROPOSED BY: Alaska Wildlife Alliance   (HQ-F22-024)
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