

January 10, 2023

My name is Mark Ortega, I am a resident of Gustavus, Alaska. Presently, I am a voting member of the Icy Straits AC. With this letter, I would like to make a comment of what I believe is a dangerous precedence being proposed by Proposals 45, 47, 48, 49, 50, 51, 52, 53, & 54 submitted by Alaska Wildlife Alliance a branch of a large National Special Interest group. Additionally, these proposals do not follow statutes set down in the Alaska Intensive Management Law of 1994.

These above mentioned proposals would have a detrimental effect concerning Top-Down managing for “Sustained Yield” of a preferred species (West v. State, BOG 248P.3d689, 2010); allowing the BOG to give priority to prey over predator. This special interest group is asking for the State to manage wolf populations for Population Diversity & Genetic Stability parameters not referred to in the Alaska Constitution. This is a slippery slope since it doesn’t manage for concerns of a preferred species. I would imagine these parameters are subject to differing opinions as to what is needed to make a sustainable population. In light of how hard it is to make a population estimate with a reasonable amount of error (Roffler et al 2016) for wolves in Southeast Alaska; I would think these parameters would be just as difficult if not more so. Also they ask the BOG to use controversial estimates for non-reported wolf mortality (Roffler et al 2016) and take this number right of the top of an allowable harvest quota.

Additionally, these proposals support such management tools as emergency closures, shorten wolf seasons, more burdensome reporting requirements, restricting certain areas to harvest, and omitting wolf population on satellite islands in and around the main island from enumeration all lead to deterring trapper/hunter effort. In Unit 2 this would limit the required action described in the Intensive Management Act if we consider the deer population to be a critical food resource for residents of this area.

How does this effect my board area? Presently, just across from Gustavus is an island call Pleasant Island (PI) which was historically the main deer harvest area for this community; presently a model example of a predator pit and is now devoid of deer. Wolves are still on Pleasant Island living off beach scavenging of washed ashore sea otters & other marine carrion, making re-establishment of a deer population impossible. The island has been under study by a well funded Southeast Wolf biologist group since island deer population extinction. But no Intensive Management statutes have been initiated for this predator pit?

Also on the mainland is another predator pit in the making this is within the Gustavus fore-lands. A small group of wolves has historically been present in this area. Moose moved into the area late 1980’s and quickly the population grew in this new virgin wintering area. Moose degraded the browse in this area and over-ran the carrying capacity for browse and a few back to back hard winter lowered this population. Wolf populations quickly increase taking advantage of this new food source and they never slowed down. Presently, moose populations are “believed” below carrying capacity of this winter browse and the ADFG management has initiated spike/fork/fifty rules with a quota of approximately 12 moose harvested both illegal & legal. However, presently the wolf population has “seemingly” become one of the limiting factors of the moose population.

Presently, we have a robust seemingly well funded wolf study in the Gustavus fore-lands & PI area; but the moose/deer studies for these populations: calf/fawn counts, condition/fecundity factors, and mortality studies have become limited. We have no published wolf population estimates to date but do

have scat studies showing that these ungulates are a good portion of their diet (Gustavus fore-lands moose) or had been a good portion with respect to PI deer.

What are we getting from these wolf studies to help manage moose (preferred species) on Gustavus fore-lands? If we take POW published information we will be getting same highly controversial populations estimates and non-reporting mortality numbers; which will not help moose issues but possibly lead to low wolf quotas and to revive a proposed Endangered Species Act (ESA) listing of the Alexander Archipelago wolf; both on the mainland and islands of Southeast Alaska. What than? Do we throw out the Intensive Management Act of 1994; and wait till the wolves become unlisted?

Might we not look at a Bottom Up management effort; giving some weight to estimates and ideas from Ketchikan AC (Proposal 46), discussions with POW trappers/deer hunters. These kind of folks are also present in Units 1C & 1D. However with respect to these Bottom-up managers the Wildlife Alliance verbiage quoted in Proposal 48: "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."

As is quite well known that instituting conventional wolf control in Southeast habitat is impractical & controversial. The least we could do is make an attempt to limit restrictions on the hunters and trappers' ability to harvest this very difficult quarry in the future.

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