

## **PROPOSAL 51**

**5 AAC 84.270. Furbearer trapping.**

**5 AAC 85.056. Hunting seasons and bag limits for wolf.**

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

Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season, require in-season reporting, provide the harvest to the public in real time, and allow three days' notice before closing the season by emergency order 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 Board of Game (BOG) is to establish the percentage of the wolf population that can be safely harvested on a sustainable basis. Using the department's latest available population estimate, and accounting for wolf mortality (natural, legal human harvest, and illegal human harvest), the department develops a harvest quota each season. The department shall monitor the annual harvest of wolves in Unit 2 with in-season reporting. That reported taking shall be tallied and made available so trappers and hunters know whether the harvest quota is being approached. At least three days notice shall be given before a season is closed by emergency. An additional allowance of up to three days may be given if adverse weather conditions require.

This proposal speaks to the management framework only, and adopts the same method that was used to manage wolves in Unit 2 from 1997 through 2018. Returning to that method, with the benefit of annual population estimates, a population objective, more convenient in-season reporting requirements, and a transparent public process represents a significant improvement over the current system. This proposal echoes a recommendation of the Interagency Wolf Technical committee.<sup>2</sup>

It is understood that a majority of lands in Unit 2 (72%) are federal lands, administered by the USDA Forest Service (USFS). The USFS recognizes the state to be the primary manager of game species on federal lands when not in conflict with USFS government regulations. Hence, state regulations apply to all federal and state lands in Unit 2 unless a person is harvesting under federal subsistence regulations. The Federal Subsistence Board (FSB) sets regulations for federally qualified subsistence users on federal lands. In order to reduce regulatory confusion and ensure successful management of game species the FSB often aligns with State regulations. If the BOG adopts this proposal it is likely the FSB will adopt the regulation on federal lands for federally qualified users to avoid regulatory confusion and ensure successful management of wolves.

**What is the issue you would like the board to address and why?** The management scheme that the BOG adopted in 2019 (per the department's recommendation), which aims to meet wolf population objectives set by the BOG by season length alone, is too blunt to meet the management needs of this wolf population. The current management scheme inadequately controls harvest, and requires annual Emergency Orders to work.

The department manages wolf populations by managing direct human-caused mortality. Mortality is most commonly controlled by limiting the number of hunters and trappers, installing bag limits, or establishing harvest quotas. It can be crudely controlled by adjusting season length, but without

bag limits, trappers can take too many animals if conditions are ideal, or too few animals if conditions are poor. It is difficult to consistently and accurately predict the number of trappers that will participate, and the number of animals that will be taken, in a given season.

This was proven in the very first year (2019) the new population objectives management system went into effect. The prior year population estimate was 170 wolves in Unit 2 (or 178, depending on which department report is referenced). Either is squarely within the desired wolf population range of 150-200 wolves. The department had suggested, and the board adopted, a season length guideline of up to eight weeks when populations were in that range. In-season reporting requirements were also rescinded on the mistaken belief that this system would work well without monitoring the kill.

In that first 8-week season, a record 165 wolves were legally harvested and an untold additional number lost to natural mortality, wounding loss, and illegal take. The gross overharvest was shocking, but was explained by the department as being a result of higher-than expected trapper numbers—an admission that reinforces the inadequacy of a season-length only management tool.

To correct for this apparent problem, the department has abandoned the general season-length guidelines the board adopted. Instead, in every season since 2019, the department has shortened the trapping season by a “pre-emptive” emergency order/regulation. In effect, they anticipate the emergency, and substantially shorten the season under emergency authority before it even starts.

Using season length to control harvest amounts to a guessing game. Compounding the problem is the fact that this game now takes place behind closed doors. There is no opportunity for input from the BOG, or the public. The crude nature of this tool leaves wolves at risk. The opaque nature of this tool leaves the public frustrated and distrusting.<sup>1</sup>

<sup>1</sup> Resolution 21-04 by the City of Coffman Cove, passed 4 November 2020.

<sup>2</sup> “Any management plan should include population and **harvest objectives** for wolves, clear direction on how wolf abundance will be estimated and **measurable indicators that will trigger specific management actions** (emphasis added). This larger planning effort would be outside the scope of normal survey and inventory activities and to be successful should be led by ADF&G.” from: Porter, B. 2018. *Wolf management report and plan, Game Management Unit 2: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska*

**PROPOSED BY:** Alaska Wildlife Alliance

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