	WP26–09/10 Executive Summary
General Description	Wildlife Proposal WP26-09, requests to move the start date for wolf trapping in Unit 2 from November 15th to December 15th. Wildlife Proposal WP26-10, requests to establish a guaranteed 47-day wolf trapping season by changing the end date for wolf trapping in Unit 2 from March 31st to December 31st.
Proposed Regulation	WP26-09 **Unit 2 –Wolf Trapping** *No limit.* ~~*Nov. 15*~~ ***Dec. 15****-Mar. 31.* WP26-10 **Unit 2 –Wolf Trapping** *No limit.* *Nov. 15-* ~~*Mar. 31*~~ ***Dec. 31****.*
OSM Preliminary Conclusion	**Oppose** Proposals WP26-09 and WP26-10
Southeast Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	**None**

Draft Wildlife Analysis
WP26-09/10

ISSUE

Wildlife Proposal WP26-09, submitted by East Prince of Wales Fish and Game Advisory Committee (AC), requests to move the start date for wolf trapping in Unit 2 from November 15th to December 15th.

Wildlife Proposal WP26-10, submitted by the Craig Tribal Association, requests to establish a guaranteed 47-day wolf trapping season by changing the end date for wolf trapping in Unit 2 from March 31st to December 31st.

Proponent Statement

Wildlife Proposal WP26-09

The proponent states that since the wolf trapping season start date was moved from December 1st to November 15th six years ago, there has been an overwhelming increase in conflicts with other user groups and bears. These user groups include deer hunters, waterfowl hunters, and biologists conducting Unit 2 wolf population studies. Having a later start date would reduce these conflicts.

The proponent explains that one of the most important reasons for this requested change is because of the wolf population study in Unit 2. The wolf population study is conducted into early December each year. It has been voiced at many wolf meetings with the Alaska Department of Fish and Game (ADF&G) and the U.S. Forest Service (USFS) that the study is in direct competition with the wolf trappers. Study staff members have reported run-ins with wolf trappers when they are collecting data needed for the management of the Unit 2 wolf population. The wolf population study is essential, so Unit 2 has a sustainable wolf harvest. Additionally, the proponent states that with warmer falls and mild winters, most trappers would prefer to wait to trap until mid-December because that is when wolf pelts become prime. With a short 30-day wolf trapping season in Unit 2, trappers are forced to start trapping on November 15th, when wolf pelts don't have the thickest undercoating and longest guard hairs.

The proponent elaborates that it's common for wolf trappers to set in tide flats or in the heads of bays. These areas are also used by waterfowl hunters in November and puts added stress onto them if their dog wanders into a wolf set. Another conflict that concerns the proponent is that a significant number of black bears are still preparing to hibernate in late November. These bears have destroyed expensive wolf leg-hold traps, which is the preferred method of take by Unit 2 trappers. Some trappers use snares and have reported they have caught black bears in their sets. These accidental catches of black bears mostly occur in November. The proponent continues that late November also overlaps with the deer rut when Prince of Wales Island (POW) becomes inundated with deer hunters. Several wolf trappers have had deer hunters come across them while they are setting their traps.

The proponent notes that they submitted a parallel proposal to the Alaska Board of Game (BOG) to change the Unit 2 wolf trapping season opening date to December 15th under State regulations as well.

Wildlife Proposal WP26-10

The proponent states that rural subsistence users of Unit 2 are losing harvest opportunities due to inconsistent season management. Although regulations currently allow for a 5-month wolf trapping season, it is frequently closed by emergency order, creating uncertainty for rural users who rely on predictable harvest opportunities. Data analysis indicates there is a harvestable surplus above the established population goal of 150-200 wolves, yet rural users are not being provided consistent access to this resource. The proponent states that establishing a guaranteed 45-day season would provide rural subsistence users of POW with a reliable, predictable trapping opportunity during the most productive trapping period (November-December). This would enhance subsistence opportunities while still maintaining sustainable wolf population management and aligns with wildlife management goals, consistent with ANILCA. The proponent includes data demonstrating a harvestable surplus of wolves exists that could support additional trapping opportunities, including the estimated wolf population and harvest over the past 10 years. The proponent also mentions most traps are accessed by boat, and that a Nov. 15-Dec. 31 season coincides with weather conditions still suitable for boat access.

Current Federal Regulations

Unit 2 –Wolf Hunting

No limit.	*Sept. 1-Mar. 31.*
Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter for each wolf, and all hides must be sealed within 15 days of take.	

Unit 2 –Wolf Trapping

No limit.	*Nov. 15-Mar. 31.*
Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the trapper for each wolf, and all hides must be sealed within 15 days of take.	

Proposed Federal Regulations

WP26-09

Unit 2 –Wolf Trapping

No limit.	*~~Nov. 15~~* ***Dec. 15****-Mar. 31.*

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the trapper for each wolf, and all hides must be sealed within 15 days of take.

WP26-10

Note: The POW District Ranger has delegated authority to close/reopen/adjust season dates for wolf trapping in Unit 2. While not explicit in the submitted proposal, this authority would need to be rescinded to achieve the proponent's intent of a 47-day guaranteed trapping season under Federal regulations.

Unit 2 –Wolf Trapping

No limit.	*Nov. 15-* ***~~Mar. 31~~ Dec. 31****.*

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the trapper for each wolf, and all hides must be sealed within 15 days of take.

Current State Regulations

Unit 2−Wolf Hunting

Residents and Non-residents—5 wolves.	*Sept. 1-Mar. 31*

All wolves taken in Unit 2 shall be sequentially numbered/marked by the hunter, the hunter shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.

Unit 2−Wolf Trapping

Residents and Non-residents—No limit. *Nov. 15-Mar. 31*

All wolves taken in Unit 2 shall be sequentially numbered/marked by the trapper, trappers shall call the department within 7 days of take to report the date and location of take for each wolf, and all hides must be sealed within 15 days of take.

Extent of Federal Public Lands

Unit 2 is comprised of approximately 78% Federal public lands that consist of 99.82% USFS managed lands.

Customary and Traditional Use Determination

The Federal Subsistence Board (Board) has not made a customary and traditional use determination for wolf in Unit 2. Therefore, all rural residents of Alaska may harvest wolves in this unit.

Regulatory History

From 1915 through the early 1970s, the government paid a cash bounty for wolves in Southeast Alaska and, during the 1950s, the Federal government poisoned wolves in the region to increase deer numbers (Porter 2018). Following the discontinuance of the wolf bounty program, wolf hunting and trapping regulations in Unit 2 remained the same until 1992 (Larsen 1994).

In 1990, Federal hunting and trapping regulations were adopted from State regulations. State and Federal trapping seasons were Nov. 10-Apr. 30 with no harvest limits, and State and Federal hunting seasons were year-round with no harvest limits.

Also in 1990, an interagency committee sponsored by the USFS expressed concern about the viability of wolves in Southeast Alaska due to extensive timber harvesting on the Tongass National Forest (Porter 2018).

In 1992, the BOG restricted the State hunting season to Aug. 1-Apr. 30 and decreased the harvest limit to 5 wolves.

In 1993, the Biodiversity Legal Foundation and an independent biologist from Haines, Alaska, petitioned the USFWS to list the Alexander Archipelago wolf as a threatened subspecies pursuant to the Endangered Species Act (ESA) (Porter 2018).

In 1994, the Board adopted Proposal P94-02 to align the Federal wolf hunting season and harvest limit with the State (Aug. 1-Apr. 30 with a 5-wolf harvest limit).

In 1995 and 1997, the USFWS responded to the 1993 petition, finding the listing not to be warranted because the Alexander Archipelago wolf population appeared to be stable and because of a 1997 Tongass National Forest Management Plan, which identified a system of old-growth forest reserves geared toward conserving deer (primary prey of wolves) and, by extension, wolves (USFWS 1995, 2016, Porter 2003).

In 1997, the BOG implemented an annual Harvest Guideline Level (HGL) of 25% of the estimated Unit 2 fall wolf population (**Table 1**). The BOG established this maximum harvest level in response to a record and possibly unsustainable wolf harvest of 132 wolves in 1996 (Porter 2018). As the estimated wolf population was 360, the harvest quota was 90 wolves (see Biological Background section for sustainable harvest rates). The BOG also shortened the State hunting and trapping seasons to Dec. 1-Mar. 31 and required sealing within 30 days of harvest (Person and Logan 2012, Porter 2003).

Also, in 1997, the Board adopted Proposal P97-08 to align Federal wolf hunting and trapping seasons and sealing requirements with the new State regulations. The Board also required that wolves must have the radius and ulna of the left foreleg naturally attached to the hide until sealing. Foreleg bone measurements are used as a proxy for wolf ages (pup, yearling, adult), providing population age structure and recruitment information.

In 1999, ADF&G closed the wolf season a month early (on February 29, 1999) because the HGL was predicted to be reached before the normal closing date (Person and Logan 2012, Bethune 2012, Porter 2003). Several new trappers worked Unit 2 in 1999 with good success, whereas historically only 3-4 trappers exceeded 10 wolves each (Porter 2003).

In 2000, the BOG increased the HGL to 30% based on analyses indicating Unit 2 wolves experience low natural mortality (Porter 2018). The assumed wolf population was adjusted to 300 wolves, so the quota remained 90 wolves (Porter 2018).

In 2001, the Board adopted Proposal WP01-05 to shift both the hunting and trapping seasons from Dec. 1- Mar. 31 to Nov. 15- Mar. 15. The intent was to provide better access when less snow is on the ground and to coincide seasons with when wolf pelts are the most prime.

In 2003, the Board adopted Proposal WP03-10 with modification to extend the wolf hunting season from Nov. 15-Mar. 15 to Sep. 1-Mar. 31 to provide additional subsistence harvest opportunity, particularly during the fall deer hunting season and because wolf pelts prime early in Unit 2 (OSM 2003). The Board also delegated authority to the Craig and Thorne Bay District Rangers to close the Federal hunting and trapping season in consultation with ADF&G and the Chair of the Southeast Alaska Subsistence Regional Advisory Council (Council) when the combined Federal-State harvest quota is reached (**Appendix 1**).

In 2007, the Board adopted Proposal WP07-15 with modification to change the closing date of the trapping season from March 15 to March 31 to provide more subsistence opportunity and to align the

closing dates of State and Federal hunting and trapping seasons. The modification eliminated the requirement of leaving the radius and ulna of the left foreleg naturally attached to the hide until sealing.

In 2010, the ADF&G reduced the harvest quota to 60 wolves in response to a perceived decline in the wolf population (Porter 2018).

In 2011, the BOG changed the sealing requirement from 30 days to 14 days after harvest to help managers make quicker in-season management decisions (Bethune 2012).

Also in 2011, the Center for Biological Diversity and Greenpeace filed a second petition to list the Alexander Archipelago wolf as a threatened or endangered species under the ESA, including a request to consider Unit 2 wolves as a distinct population segment (DPS) (Porter 2018, Toppenberg et al. 2015).

In 2012, the Board adopted Proposal WP12-19 to change Federal sealing requirements to 14 days after harvest, aligning with State regulations. The Board shortened the sealing requirement to allow more efficient tracking of harvest to avoid exceeding harvest quotas.

From 2013-2018, ADF&G closed the Unit 2 wolf season early by emergency order because harvest quotas were expected to be met (**Table 1**). In 2014, ADF&G further reduced the harvest quota to 25 wolves based on recent population estimates (Porter 2018).

In 2015, the BOG revised the HGL to 20% in response to decreased population estimates and high estimates of unreported mortality (Porter 2018). As an additional conservation measure to account for unreported harvests and to address concerns about a declining population and potential listing under the ESA, State and Federal managers reduced the harvest quota by 50% (10% HGL) in 2015 and 2016 (**Table 1**) (SERAC 2017).

Also, in 2015, the Board rejected Special Action Request WSA15-13 to close the Federal wolf hunting and trapping seasons for the 2015/16 regulatory year to all users. The Board determined the closure was not warranted for either conservation concerns or continuation of subsistence uses, noting that ADF&G and the USFS had established a very conservative harvest quota for the year.

In January 2016, the USFWS issued another "not warranted" finding in response to the 2011 ESA petition as the Alexander Archipelago wolf appeared stable and viable across most of its range (USFWS 2016, Porter 2018). Additionally, the USFWS determined that Unit 2 wolves did not meet the criteria for a DPS designation (persisting in a unique ecological setting, marked genetic differences, comprising a significant portion of the range) (USFWS 2016, Porter 2018).

In 2018, the Board rejected Proposal WP18-04 to increase the HGL to 30% under Federal regulations. The Council had submitted the proposal because it believed previous quotas were too conservative and did not accurately reflect the Unit 2 wolf population. The Board rejected the proposal due to conservation concerns over unsustainable harvests as well as concerns about the difficulty of State and Federal managers implementing separate quotas, which would also create confusion among users (FSB

2018). However, the Board expressed desire for the USFS and ADF&G to work together to find a sustainable solution to the Unit 2 wolf issue (FSB 2018).

In October 2018, the Board issued a new delegation of authority letter to the in-season managers of Unit 2 wolves. The new letter stated that the in-season managers could close, reopen, or adjust the Federal hunting and trapping season for wolves in Unit 2 after coordination with ADF&G, OSM, and the Council Chair (**Appendix 1**).

In 2018, the BOG received three proposals for Unit 2 wolves for the 2018/19 regulatory cycle (effective July 1, 2019). The Council submitted Proposal 42 to increase the HGL to 30%. ADF&G submitted Proposal 43 to change the harvest management strategy from using HGLs to meeting specified population objectives. Proposal 43 also proposed changing the sealing requirement for the State trapping season to 30 days after the close of the season as the new management strategy would not depend on in-season harvest management (ADF&G 2019d). The Craig AC submitted Proposal 44 to change the opening date of the wolf trapping season from Dec. 1 to Nov. 15, which would align with the Federal trapping season opening date. The Council and ADF&G had identified the need for population objectives for Unit 2 wolves to clarify and direct management and that population objectives should be set through a transparent, public process (Porter 2018, SERAC 2017). The Council withdrew Proposal 42 in support of Proposal 43.

In January 2019, the BOG adopted Proposal 43 as amended, which had overwhelming support from five Advisory Committees and the public (SERAC 2019, ADF&G 2019d). The BOG established the population objective range for Unit 2 wolves as 150-200 wolves (see Biological Background section) (ADF&G 2019a). The BOG also adopted Proposal 44, extending the State trapping season to align with the Federal season.

In 2019, the Council submitted Wildlife Special Action Request WSA19-02 to extend the sealing period for wolf hunting and trapping and to remove language referencing a combined Federal-State harvest quota for wolves in Unit 2 for the 2019/20 regulatory year. In August 2019, the Board approved WSA19-02, stating that the new management strategy should help ensure a sustainable population and encourage better harvest reporting. The Board also stated that announcing predetermined season lengths provides predictability to users and renders the in-season sealing requirement unnecessary (ADF&G 2019f).

In late October 2019, ADF&G and the USFS announced that 2019/20 State and Federal hunting and trapping seasons for wolves in Unit 2 would close on January 15, 2020, resulting in a two month trapping season based on the unit-wide population estimate of 170 wolves. Under the new harvest management strategy, when the most current population estimate is within the objective range of 150-200 wolves, the trapping season may be up to two months long (see Biological Background for more information on this harvest management strategy) (ADF&G and USFS 2019).

In April 2020, the Board adopted Proposal WP20-16/17. WP20-16 requested extending the sealing period for wolf trapping in Unit 2 from within “14 days of harvest” to “within 30 days of the end of the season” and removing language referencing a combined Federal-State harvest quota. WP20-17

requested the same sealing period extension and removal of harvest quotas for wolf hunting in Unit 2, as well as increasing the hunting harvest limit from "5 wolves" to "no limit". The proposed changes mirrored the requests of WSA19-02 with the exception of changing the hunting harvest limit to "no limit." The Board adopted these proposals to facilitate management of the wolf population and reduce regulatory complexity by aligning Federal and State regulations, noting that the majority of wolves harvested in Unit 2 are taken on State-managed lands. The Board also stated that extending the sealing requirement reduced the regulatory burden on Federally qualified subsistence users. Proposals WP20-16/17 were also supported by the Council, ADF&G, and the Interagency Staff Committee (FSB 2020).

In July 2020, the Center for Biological Diversity, Alaska Rainforest Defenders, and Defenders of Wildlife submitted a petition to the U.S. Department of the Interior to list the Alexander Archipelago wolf in Southeast Alaska as threatened or endangered under the ESA (Wolf et al. 2020).

Also, in 2020, Emergency Wildlife Special Action WSA20-08 submitted by Alaskans for Wildlife requested delaying the opening date of the wolf hunting season in Unit 2 from September 1 to November 1. This was intended to allow time for the 2019 population estimate to become available. The new harvest management strategy adopted by the Board and the BOG relies on population estimates to set season lengths. ADF&G reported delays in lab analysis of the DNA samples due to the COVID-19 pandemic and did not expect the population estimates before mid-to-late September. Lack of a population estimate required a cautious approach to wolf management given the high reported wolf harvest in 2019. The Federal in-season manager used their delegated authority to announce the delayed opening date of October 31 to allow time for the population estimate to become available. Population data were released on October 26, 2020, estimating 316 wolves. Harvest effort during fall 2019 was much higher than anticipated and resulted in an unsustainable level of harvest (165 wolves, >50%). After a public hearing on October 29, 2020, managers limited State and Federal wolf trapping seasons in Unit 2, closing all seasons on December 5, 2020. Federally qualified subsistence users had 36 days of hunting and 21 days of trapping opportunity for wolves in Unit 2 for the 2020 season (ADF&G and USFS. 2020a, ADF&G and USFS. 2020b).

In March 2021, the BOG adopted Proposal 194 as amended, requiring all wolves taken in Unit 2 to be sequentially numbered/marked by the hunter or trapper. In addition, it required hunters and trappers to call the ADF&G within seven days of take to report the date and location of take for each wolf, and that all hides must be sealed within 15 days of take. ADF&G brought Proposal 194 before the BOG to correct an unforeseen consequence of a 2019 change in regulation. The reduction in reporting and sealing time would allow for more precise information to improve population estimates. The Southeast Council opposed Proposal 194 as it was presented, especially if it was implemented in a shortened wolf season. Proposal 194 required wolves to be sealed within seven days of harvest. The Council expressed concerns that a seven day after harvest sealing requirement could affect a trapper's ability to trap efficiently while meeting weekly sealing requirements. The Council stated they would support a sealing requirement of seven days after the end of the season and a companion Federal proposal should be submitted. Proposal 194 was amended twice. The amendments changed the sealing requirement from seven days after harvest to 15 days after harvest and added the requirement to call ADF&G

within seven days of harvest to report the date and location of the wolf harvest. Additionally, the amendments also required hunters and trappers to sequentially number/mark the hides (ADF&G 2021).

On July 27, 2021, the USFWS announced in a 90-day finding that the petition to list the Alexander Archipelago wolf under the ESA presented substantial information, including illegal and legal trapping and hunting, initiating a status review to determine whether the petitioned action is warranted.

In November 2021, ADF&G and USFS announced a 31-day wolf trapping season under State and Federal regulations from Nov. 15-Dec. 15, 2021 based on the most recent population estimate of 386 wolves (ADF&G and USFS, 2021, Schumacher 2021, pers. comm).

In April 2022, the Board adopted Proposal WP22-03 with modification to require all wolves taken in Unit 2 be sequentially numbered and marked with the date and location of harvest for each wolf, and that all hides must be sealed within 15 days of take. The modification removed the requirement to call ADF&G within 7 days of take to report the date and location of harvest.

In August 2023, the USFWS announced that listing the Alexander Archipelago wolf under the ESA is not warranted (USFWS 2023).

In 2022, 2023, and 2024, State and Federal wolf trapping seasons in Unit 2 were 31-days, closing December 15th via Emergency Order and Special Action, respectively (**Table 1**).

Table 1. Management data for Unit 2 wolves using the Harvest Guideline Level (HGL) management strategy. Population estimates from 2014-2024 are from DNA-based spatially explicit capture-recapture studies, and reflect the estimate used to determine that years quota/season length (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G and USFS 2019, Schumacher 2021, pers. comm, ADF&G 2022, 2024; Crupi 2025 pers. comm).

Regulatory Year	Population Estimate*	Harvest Guideline level (HGL %)	Harvest Quota	Reported Harvest	Date closed by State Emergency Order
1996				132	
1997	360	25	90	78	
1998	360	25	90	91	
1999	360	25	90	96	Feb. 29
2000	300	30	90	73	
2001	300	30	90	62	
2002	300	30	90	64	
2003	300	30	90	33	
2004	300	30	90	77	
2005	300	30	90	60	
2006	300	30	90	38	
2007	300	30	90	34	
2008	300	30	90	26	
2009	300	30	90	24	
2010	200	30	60	20	
2011	200	30	60	28	
2012	200	30	60	52	
2013	200	30	60	57	Mar. 19
2014	221*	30	25	31	Feb. 22
2015	89*	20	9	7	Dec. 20
2016	108*	20	11	30	Dec. 21
2017	231*	20	46	64	Dec. 16
2018	225*	20	45	46	Dec. 18/21**
2019	187*	n/a	n/a	164	Jan. 15***
2020	316*	n/a	n/a	68	Dec. 5****
2021	386*	n/a	n/a	66	Dec. 15
2022	268*			62	Dec. 15
2023	259*			71	Dec. 15
2024	238*			74	Dec. 15

* Population estimates from 1997-2013 were assumed estimates based on harvest levels and a 1994 population estimate. Population estimates from 2014-2024 are from DNA-based spatially explicit capture-recapture studies, and reflect the estimate used to determine that years quota/season length (see Biological Background section).

** Season closed by Emergency Order on Dec. 18 but reopened to Dec. 21 because bad weather prevented trappers from recovering gear.

***Season closing date announced according to the new harvest management strategy.

****Federal hunting season was closed September 1 and reopened on October 31 to allow time to acquire the 2019 population estimate (ADF&G and USFS. 2020b).

Current Events

The proponent of Proposal WP26-09 stated that the East Prince of Wales AC submitted a companion proposal for the Southeast region BOG meeting scheduled to take place January 23-27, 2026, requesting the Unit 2 wolf trapping season to open December 15th under State regulations.

ADF&G indicated they'd submit a proposal to revise the harvest management strategy, which could affect this analysis.

Proposal WP26-01 requests to move authority to manage Federal hunts currently delegated to Federal in-season managers through Delegation of Authority Letters (DALs) into unit-specific regulations for many hunts across Alaska and to rescind the associated DALs. The delegated authority to the Craig and Thorne Bay district rangers for in-season management of Unit 2 wolves is included in this proposal (**Appendix 1**).

At the Southeast Council's winter 2025 meeting, the Council voted to send a letter to the Board requesting changes to wolf management in Unit 2. Specifically, the Council expressed the need for more opportunities to harvest Unit 2 wolves because subsistence needs for wolves are not being met. Based on traditional ecological knowledge (TEK) and local observations, the Council believes there is a harvestable surplus of wolves on Unit 2, and they are being managed too conservatively, inconsistent with the harvest management strategy. The Council requests that the Board support a 45-day minimum trapping season for Unit 2 wolves, and direct the in-season manager to strongly consider TEK and local subsistence users' knowledge when setting trapping season lengths.

Biological Background

Unit 2 wolves are part of the Alexander Archipelago wolf subspecies, which ranges from coastal British Colombia north to Yakutat, Alaska, and includes the islands in Southeast Alaska, excluding Unit 4 (USFWS 2015). Alexander Archipelago wolves tend to be smaller with shorter hair than continental wolves and can be genetically differentiated (USFWS 2015, Porter 2018). Because of the relatively high density of prey available, the islands of Unit 2 have long been assumed to support the highest densities of wolves in Alaska (Porter 2018). Using the best available data and modeling, USFWS (2015, 2016) estimated that the 2013 and 2014 Unit 2 wolf population comprised 13% (130-378 wolves) and 6% (50-159 wolves) of the total Alexander Archipelago wolf population (865-2,687 wolves), respectively. Indeed, USFWS (2015) notes that even the low, 2014 wolf density estimates for Unit 2 (9.9 wolves/1,000 km^2) are not particularly low by most standards for Northern wolf populations (Fuller et al. 2003). USFWS (2023) notes that the Prince of Wales Island Complex analysis unit does not represent a significant portion of the range for the Alexander Archipelago wolf. The Prince of Wales Island Complex analysis unit only represents approximately 4.5 percent of the overall geographic range of the Alexander Archipelago wolf (USFWS 2023)

State management objectives for Unit 2 wolves include (Hasbrouck 2022):

- Maintain a fall population estimate of 150-200 wolves.

From 1997, when the HGL management strategy was implemented, through 2013, Unit 2 wolf abundance was uncertain. Managers based decisions (e.g. harvest quotas) on assumed population levels, sealing records, and a 1994 population estimate (SERAC 2019, ADF&G 2019b, Porter 2003). Person and Ingle (1995) used a simulation model using radio-collared wolf data collected for a graduate research project and estimated that 321 wolves and 199 wolves inhabited Unit 2 in fall 1994 and spring 1995, respectively (Porter 2003). The smaller spring estimate reflects overwinter mortality, primarily from trapping (Porter 2003). Between 1998 and 2002, Porter (2003) assumed the Unit 2 wolf population had remained relatively abundant because of consistently high harvests, which provided a population index.

Several methods have been used to improve the accuracy of wolf populations estimates. Since 2013, ADF&G in cooperation with the USFS, the Hydaburg Cooperative Association, and The Nature Conservancy have employed a DNA-based spatially explicit capture-recapture (SECR) method to estimate Unit 2 wolf abundance (SERAC 2019, ADF&G 2019b). This method has been found to be the most robust and least biased method of estimating wolf populations in forested habitats (Roffler et al. 2016). The study uses hair boards equipped with scent lure to attract wolves and barbed wire to obtain hair samples that are sent to a lab for DNA analysis. Samples are collected from mid-October through December and lab results are usually available in late July (SERAC 2019, ADF&G 2015). Thus, harvest management decisions are made with last year's wolf population estimate. While these surveys and population estimates are currently conducted annually, they are expensive and labor intensive. Therefore, ADF&G will likely transition to conducting population estimates every 2-3 years in the future (ADF&G 2019d).

Population estimates suggest that the Unit 2 population increased between 2014 and 2021, peaking at 386 wolves, but have since declined to 238 wolves in 2024, which is still above the population objective range. During this time period, Unit 2 wolf population estimates have ranged from 89-386 wolves (**Table 1, Figure 1**) (Schumacher 2019, pers. comm. as cited in OSM 2020, ADF&G, and USFS. 2020a). While the point estimates for the first two years of the DNA-based SECR method differ drastically, statistically, no difference exists between the two estimates due to overlapping confidence intervals (C.I.). As the study progressed, more hair boards were deployed, more wolves were recaptured in subsequent years, and staff became more skilled at handling samples, resulting in tighter 95% confidence intervals. The wolf population estimate increased significantly between 2016 and 2017 (ADF&G and USFS 2020a). The most recent 2024 estimate was 238 wolves, with a 95% C.I. of 184-308 wolves, and recent estimates indicate the population is stable (ADF&G 2024). In addition to SECR population estimates, local hunters and trappers have expressed seeing many more wolves in recent years (SERAC 2017, 2018, 2025).

Carroll et al. (2014) considered wolf populations of <150-200 individuals as small, and USFWS (2015) notes that most minimum viable population estimates for gray wolves range between 100 and 150

wolves. However, despite the comparatively small size and insularity of the Unit 2 wolf population, inbreeding probably is not affecting it (Breed 2007; USFWS 2015, 2023).

Humans cause the majority of wolf mortality in Unit 2. Natural causes account for only 4% of the annual mortality of the Unit 2 wolf population, while human-caused mortality accounts for the remainder (Person and Russell 2008, Wolf Technical Committee 2017). Person and Russell (2008) studied 55 radio-collared wolves in Unit 2 from 1993-2004: 39 wolves (71%) were killed by humans, while only 5 (9%) died from natural causes. Similarly, ADF&G collared an additional 12 wolves from 2012-2015, and 8 (67%) were killed by humans, while only 1 (8%) died from natural causes (USFWS 2015). However, these studies took place in portions of Unit 2 where road access was greater, likely resulting in higher harvest. Therefore, human-caused mortality rates may be potentially inflated (USFWS 2015).

While wolves are generally resilient to high levels of harvest and human activity (USFWS 2015, Weaver et al. 1996), over-exploitation can still be a risk. Wolves usually buffer human predation with their high potential annual productivity and long dispersal abilities. If sufficient prey is available, wolves can rapidly repopulate areas depleted by hunting and trapping (USFWS 2015, Ballard et al. 1987). However, due to differences in wolf population characteristics (e.g. sex/age structure), a universal, sustainable human-caused mortality rate does not exist, and the Unit 2 wolf population may be particularly vulnerable to overexploitation due to its insularity and lack of immigration (USFWS 2015, Wolf Technical Committee 2017). Person and Russell (2008) reported that a >38% total annual mortality rate for Unit 2 wolves was likely unsustainable based on past harvest rates and population estimates. The ADF&G Regional Wildlife Supervisor for Southeast Alaska stated that other wolf research and the scientific literature indicate that a healthy wolf population can sustain 30% annual mortality (SERAC 2017). Additionally, wolf harvest records indicate neither offering a cash bounty nor poisoning wolves during the early 20th century had any lasting effects on wolf abundance or distribution on Southeast Alaska islands (Porter 2018).

Alexander Archipelago wolves start breeding at 22-34 months of age, and litter sizes range from 1-8 pups, averaging 4.1 pups (USFWS 2015, Person et al. 1996, Person and Russell 2009). Person and Russell (2008) reported survival rates for Unit 2 wolves > 4 months of age as 0.54 between 1993 and 2004 (USFWS 2015). Den use occurs from mid-April through early-July, after which pups are relocated to rendezvous sites usually <1 km from their den where they remain until October (USFWS 2015, Person and Russell 2009). Pack sizes on Prince of Wales Island (POW) average 7.6 wolves in the fall and 4.0 wolves in the spring, and home range sizes average 535 km^2, which is a quarter of the size estimated for wolves on the northern mainland of southeastern Alaska (ADF&G 2015d as cited in USFWS 2015).

Harvest Management Strategy

Unit 2 is a good place to implement population objectives because there is very little dispersal into and out of the unit (ADF&G 2019d). The wolf management strategy implemented in 2019 consists of four management zones (**Figure 2**). Zone 1 sets the minimum wolf population threshold at 100 wolves and

seasons remain closed until the wolf population recovers. Zone 2 is the conservation zone, where the wolf population is estimated between 100-149 wolves, with seasons of up to six weeks to provide limited harvest opportunity and a buffer to recover the population before it declines into Zone 1. In Zone 3, the population objective range is 150-200 wolves. This is the desirable zone, and harvest would occur during seasons of up to eight weeks. When the population is in Zone 3, SECR population estimates would only be conducted every 2-4 years. Zone 4 is the over-objective zone where wolf numbers exceed 200, and seasons of up to 4 months are geared toward population reduction (ADF&G 2019b). An issue with this new strategy is the one-year time lag in obtaining population estimates. For example, if the wolf population is in Zone 1, an additional trapping season would occur before managers learned this (ADF&G 2019b, 2019c). However, the HGL management strategy also announced harvest quotas based on population estimates that were at least one year old and, prior to 2014, were assumed estimates (**Figure 1**). State and Federal managers will announce season lengths annually before November 15, the opening date for Federal and State trapping seasons (OSM 2020).

Setting these population objectives incorporates biological as well as social concerns as various user groups have strong and differing opinions about wolves in Unit 2 (e.g. subsistence deer hunters view wolves as competitors, ESA petitioners view wolves as threatened) (SERAC 2017, 2018, Wolf Technical Committee 2017, ADF&G 2019d). The population objectives also included traditional knowledge. The Craig Tribal Association testified that the USFS determined 150-200 wolves to be a sustainable range after talking with local and traditional knowledge holders on POW (SERAC 2017). Similarly, a working group of the Council also thought the population objective range should be 150-200 wolves, which is the range the BOG adopted (SERAC 2017).

Stressors

Unit 2 wolves experience numerous stressors, including harvest, logging, road development, and climate-related events (USFWS 2015, 2023; Porter 2018). In their comprehensive status assessment for the Alexander Archipelago wolf, USFWS (2015, 2023) determined the Unit 2 wolf population had low resiliency due to high rates of unreported harvest, high rates of timber harvest with detrimental effects on deer, high insularity (little immigration or emigration), and high levels of boat and road access for hunters and trappers.

The presence of wolves in an area is closely linked with prey availability (USFWS 2015, 2023). While Unit 2 wolves feed on a variety of species including beavers and salmon, deer are their primary prey (USFWS 2015, Porter 2018, Brooks et al. 2022, 2024). Both the comprehensive conservation assessment (Person et al. 1996) and the species status assessment (USFWS 2015) prepared in response to the 1993 and 2011 ESA listing petitions, respectively, identified maintaining deer populations as a primary conservation measure for Alexander Archipelago wolves (Porter 2018). Wolf abundance may be especially linked to deer abundance and availability in Unit 2 where other ungulate prey species (e.g. moose, elk, caribou) are not present (USFWS 2015, 2023).

Deer are primarily limited by habitat rather than by predation (SERAC 2017, USFWS 2015). In Unit 2, deer habitat is adversely affected by industrial-scale logging of old-growth forests, which has occurred in the unit since the 1950s and peaked in the 1980s (USFWS 2015, 2023). Since 1954, POW has been

the site of the most logging activity in the Southeast region, resulting in a 94% reduction of contiguous high-volume forest for lumber production (Albert and Schoen 2013). Overall, logging activity is estimated to have reduced deer habitat by about 46% in north central POW, and by 18% in south POW (USDA 2016). Albert and Schoen (2007) modeled deer habitat capability in Unit 2 for two time periods (1954 and 2002), determining it to have lost 38% and 11% of its habitat value in northern and southern POW, respectively (USFWS 2015). USFWS (2015, 2016) predict that past timber harvest in Unit 2 will result in 21-33% declines in the deer population and 8-14% declines in the wolf population over the next 30 years, with future timber harvest exacerbating these declines. USFWS (2016) states the rate of future timber harvest is difficult to project. Old-growth forests are considered primary deer winter range in Southeast Alaska because the complex canopy cover allows sufficient sunlight through for forage plants to grow, while intercepting snow in a way that makes it easier for deer to move and forage during winters when deep snow often hinders access to other habitats. However, ADF&G estimates that over 40% (~ 360,000 acres) of the old-growth forest once present in Unit 2 has been logged over the past 50 years, and that "the lasting legacy of previous timber harvest will continue to have negative impacts on wildlife populations" (Hasbrouck 2023: 16) and hunter success on Prince of Wales. According to Hicks (1999: 30-33; also Mazza 2003; U.S. Forest Service 1989). Deer pellet surveys were discontinued in 2019, and harvest is the only metric currently used to assess the status of the Unit 2 deer population (Hasbrouck 2023). While uncertain, harvest data and TEK indicate the Unit 2 deer population may be declining (SERAC 2025; see Proposal WP26-03/04/05 analysis).

Declines in understory vegetation correspond with decreased deer carrying capacity (USFWS 2015). Severe (deep snow) winters often result in deer population declines (e.g. Brinkman et al. 2011), and these effects are exacerbated by loss of old-growth forests. Old-growth forests have multi-layered canopies that intercept snow and moderate temperature and wind, providing shelter for and facilitating movements of deer in the winter (USFWS 2015, Porter 2018). They also maintain diverse understories that provide continuous forage for deer (USFWS 2015). Conversely, clear-cuts may temporarily provide deer with winter forage, but this forage can be buried during winters with deep snow (Porter 2018). The initial flush of forbs and shrubs in clear-cuts provide deer with lower-quality forage, and regenerating trees shade out the understory vegetation after 20-35 years (Porter 2018, USFWS 2015). Since Unit 2 timber harvest peaked in the 1980s, many stands are entering the successional stage that is very poor deer habitat (USFWS 2015).

In addition to altering the habitat of their primary prey species, logging also impacts Unit 2 wolves by constructing roads that provide relatively easy access for hunters and trappers into previously remote areas (Porter 2018, USFWS 2015). Person and Russell (2008) found roads clearly increased risk of death for POW wolves from hunting and trapping and contributed to unsustainable harvest rates. They also determined road density to be an important predictor of harvest up to 0.9 km of road per square kilometer (km/km^2). Above this threshold, increased road density did not correspond to increased harvest rates. Mean road density in Unit 2 is 0.62 km/km^2, ranging from 0-1.57 km/km^2 (Albert 2015 as cited in USFWS 2015). Person and Logan (2012) believed harvest from the densely roaded northcentral and central portions of POW were frequently unsustainable. The USFS aimed to shift timber harvest to regenerating stands and away from old-growth stands, which also allows for the use of existing roads as opposed to constructing new ones (USFWS 2015, 2016).

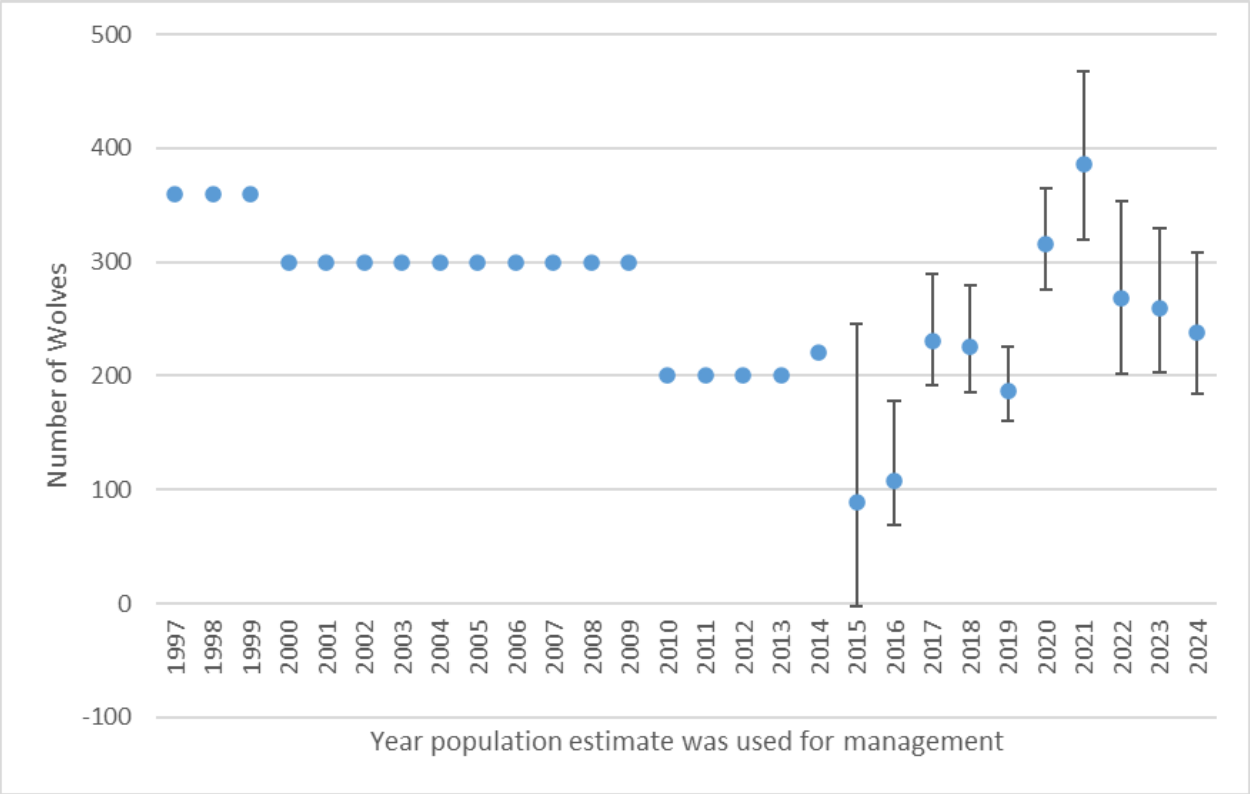

Figure 1. Unit 2 wolf population estimates, 1997-2024. Estimates from 1997-2013 are assumed from sealing records and a 1994 population estimate. Estimates from 2014-2024 are from a DNA mark/recapture study. The error bars represent 95% confidence intervals. Estimates take a year to determine; thus the population estimate for 2014 was used to set 2015 harvest quotas. The population estimates in this graph reflect the one-year time lag (e.g. the 2015 population estimate actually reflects wolf numbers during fall 2014 but was used to set harvest quotas for the 2015 season) (Schumacher 2019, pers. comm. as cited in OSM 2020; ADF&G 2020b,2023.; ADF&G and USFS 2019, 2020a, 2023, 2024; Schumacher 2021, pers. comm; Crupi 2025 pers. comm).

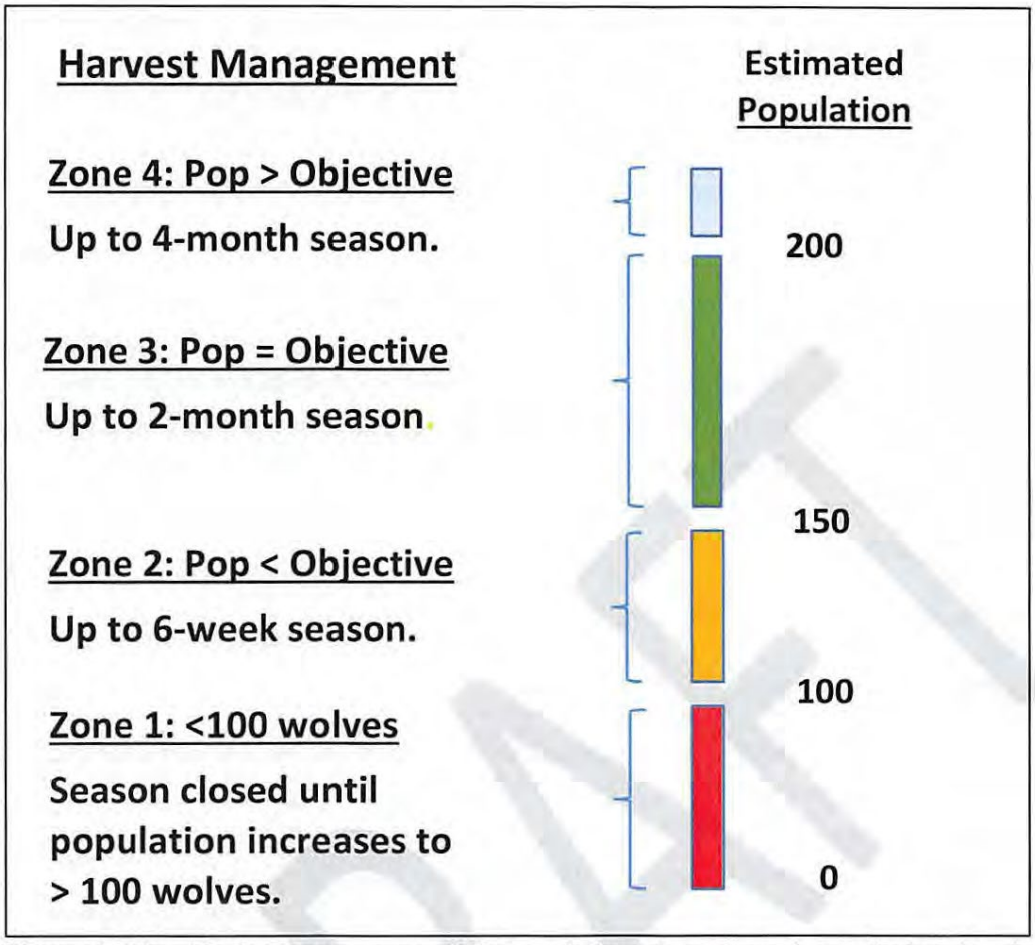

Figure 2. Population thresholds and harvest management strategies for the Unit 2 wolf population. The BOG adopted population objectives of 150-200 wolves in 2019 (figure from ADF&G 2019b).

Cultural Knowledge and Traditional Practices

Although the Tlingit, Haida, and Tsimshian [Ts'msyen] of Southeast Alaska are culturally distinct groups that are not linguistically related, they do share certain cultural values, beliefs, and practices (Brooks et al. 2022). All three groups practice matrilineal descent, recognize corporate kin groups, and share important beliefs about the nature of existence and relationships between living beings (Brooks et al. 2022). Key among these beliefs and practices is the understanding that all living beings have souls, desire respect, and are similar to humans in terms of their relationships and motivations (Brooks et al. 2022).

Wolf [Gooch in Tlingit] occupies an important organizational and spiritual role within Tlingit and Haida cultures (Brooks et al. 2022). Tlingit society is traditionally divided into two matrilineal, exogamous moieties known as the Raven and Wolf/Eagle (Emmons 1991). As such, a fundamental principle of Tlingit social process and organization is that a person must marry someone from outside

their own moiety (Brooks et al. 2022). Over time, these marriages created reciprocal, interdependent relationships between the two moieties that can be particularly important during key occasions and rituals, such as those surrounding death, house building, and totem raising (Brooks et al. 2022).

Similar to the interdependent relationships between moieties, many Tlingit recognize a symbiotic relationship between ravens and wolves in the environment (Brooks et al. 2022). "One perspective is that they are linked as ravens help wolves find prey animals, and then after the animals are harvested by wolves, ravens are able to get bits of food from those animals after the wolves have finished" (Brooks et al. 2022: 18). As Southeast Council member Mike Douville explained in a study of traditional ecological knowledge associated with the Alexander Archipelago wolf, wolves "are absolutely the peak deer predator…they are so much better at hunting than any human." (Brooks et al. 2022: 37, Brooks et al. 2024). Accordingly, several traditional Tlingit stories relate instances where a person helps an injured wolf, and in return, the wolf repays that person by giving him or her meat or teaching the person how to hunt more effectively (Brooks et al. 2022).

There are about 30-35 named clans within each Tlingit moiety (Brooks et al. 2022), and several of these clans claim wolves as group symbols or crests (Swanton 1909). Members of wolf clans ceremonially address wolves as relatives and believe the animals can embody their ancestors (ADF&G 2008). Haida people believe in similar relationships between wolves and people (Blackman 1998). The wolf's traditional importance within Tlingit culture resulted in great care and respect being shown to both living and harvested wolves (ADF&G 2008). Wolves were traditionally not eaten, except as a famine food (ADF&G 2008).

Wolves have also had significant economic and ceremonial importance throughout Southeast Alaska, as wolves have been harvested for furs and hides throughout their range in the Southeast (ADF&G 2008). Wolf fur has been and continues to be used to make ceremonial masks, blankets, robes, and other articles of clothing (ADF&G 2008). Wolf furs and hides are also traded within and between communities (Petroff 1884, De Laguna 1972, Oberg 1973, ADF&G 2008).

Traditionally, wolves were harvested in late fall and early winter because the fur was in the best condition at this time, and there was typically no deep snow to restrict travel (ADF&G 2008). Trapping usually started in November and continued through December, using snares and deadfalls set across game trails frequented by wolves (De Laguna 1972, Oberg 1973, Goldschmidt and Haas n.d. [1946], Goldschmidt and Haas 1998, ADF&G 2003, ADF&G 2008, Brooks et al. 2022, 2024). Families built and maintained trapping cabins in remote areas with high furbearer abundance (Goldschmidt and Haas 1998). Harvest areas were traditionally owned by clans that were inherited through family lineages (Goldschmidt and Haas 1998, ADF&G 2008). Preparation of animal skins was traditionally assigned to women in both Tlingit and Haida communities (Emmons 1991, Blackman 1998).

Though wolves continue to occupy important cultural and economic roles in Southeast Alaska, wolves are also seen as a direct competitor for an important subsistence resource in Unit 2 – deer (Wolf Technical Committee 2017, Brooks et al. 2022, 2024). Long-time wolf trappers and hunters that participated in recent research on the Alexander Archipelago wolf have explained that their trapping

and hunting efforts continue to be motivated by an effort to achieve a healthy balance between wolf, deer, and human populations (Brooks et al. 2022, 2024). Because deer are the preferred, primary prey for wolves in Unit 2, harvesters often use deer abundance and difficulty of harvest as an index of wolf populations and where wolf trapping needs to occur (Brooks et al. 2022, 2024). An overabundance of wolves can have a similar impact to an overabundance of deer hunters – decreasing deer numbers, making deer more skittish, and increasing competition for those that remain (Brooks et al. 2022, 2024). "Experienced hunters and trappers explained that when wolf numbers are too high, deer numbers decrease dramatically and there is inadequate subsistence harvest" (Brooks et al. 2022: 43). In Unit 2, this issue is compounded by black bear predation, the loss of quality deer habitat due to logging, and competition from non-local hunters (Brooks et al. 2022, 2024). Accordingly, as Brooks and colleagues (2022: 4) explain:

The local objective is to ensure adequate deer abundance and deer proximity to communities for subsistence harvests. There are two dimensions to consider: low abundance of deer from predation by wolves, and deer becoming too wary, or skittish, and therefore difficult to harvest in the presence of active wolfpacks. The preferred means of maintaining balance is by subsistence hunting and trapping in places where communities normally access and hunt deer and other ungulates for subsistence purposes.

Further, the preferred method of accomplishing these objectives is through heavy trapping/hunting in these key subsistence-use areas near communities on three-year cycles, in which a substantial portion of the pack is removed (Brooks et al. 2022, 2024). Experienced trappers note that packs with adequate prey and no other sources of mortality can increase in size by about 200%, if left alone for more than three years (Brooks et al. 2022, 2024). However, current wolf trapping and hunting regulations make this approach difficult (Brooks et al. 2022, 2024).

Experienced wolf trappers noted that one issue with the current regulations is that they are based on survey methods that tend to produce inaccurately low population estimates (Brooks et al. 2022, 2024). As Thomas George of Klawock explained, wolves tend to follow the deer on Prince of Wales Island, but wolf surveying methods seem to miss key areas frequented by wolves and deer (Brooks et al. 2022: 79):

They've [wolves] got summer trails, and they've got winter trails. In the summertime, they're usually up high because the deer migrate up the snowline, so the wolves are up and about way up high. So, when these guys [biologists] are doing their wolf studies to assess how many wolves are on the island, they're all looking through the bottom of the valleys, and you know, the only time you're going to find them down low like that [in the summer] is around beaver ponds and stuff [when they've run out of deer].

Similarly, others noted that wolf population estimates may be inaccurate due to the tendency to concentrate sampling efforts near roads, and place hair boards in the same places each year (Brooks et al. 2022, 2024). Mike Douville explained that underestimation of the Prince of Wales wolf population

also results from managers and researchers underestimating wolves' intelligence and sense of smell (Brooks et al. 2022: 104):

If you don't put the effort to try to keep them [traps or hair boards] scentless, your sets really just don't work very well…I don't think the hair board system is working very well because wolves are too smart for that. For me to catch them, I can't leave any smell. I do everything I can for them [wolves] not to even know that I've been there…But, when I see what they're [biologists] doing, I know that they're not going to be really successful because they leave their smell all over [smell of the hair board and the human]. So, you have to take that into consideration when you're doing your formulas because you're not getting a really good sample. Because wolves are really smart, and they don't forget. They remember everything down their trail.

Mr. Douville summarized the current situation on Prince of Wales Island, noting that an ideal wolf population needed to ensure sufficient deer for subsistence harvests would be between 100 to 150 wolves (Brooks et al. 2022). However, as Mr. Douville notes, maintaining the Unit 2 population at 100 to 150 wolves would put them below current management objectives (in management Zone 2 or just entering Zone 3, see ADF&G 2019b):

We do have a good population of wolf [on POW]. I mean, our [wolf] population is high, enough to where our deer population is – the deer harvest numbers are still going down, and they will continue to go down because we're not able to keep the wolf population at 100, 150. I would think we could probably maintain, but we're not going to build a deer population like we had in the 2000s, because all through the '90s and 2000s, up to 2010, we were able to trap like hell…So, we have two things: we have stem exclusion [forest] and a high wolf population, and we're [the deer are] still trending down (Brooks et al. 2022: 95).

Harvest History

From the 1950s through the mid-1990s, wolf harvest in Unit 2 increased in conjunction with a growing human population and increased road access associated with the logging industry, peaking at 132 wolves in 1996 (**Figure 3**) (Porter 2018). Since 1996, trapper numbers in Unit 2 have generally been declining, possibly due to an aging trapper pool and a human population that is decreasing in response to fewer timber-related jobs (Bethune 2012). Between 1997 and 2018, total trapper numbers in Unit 2 ranged from 4-26 trappers per year, averaging 14.5 trappers per year (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018). Over the same time period, trappers living in Unit 2 accounted for 60-100% of the annual Unit 2 wolf harvest, averaging 89% (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018). Most of the non-local resident harvest is by residents of adjacent communities, including Ketchikan, Petersburg, Wrangell, and Sitka (Schumacher 2019, pers. comm. as cited in OSM 2020). In 2019, total trapper numbers in Unit 2 increased substantially, with 32 trappers sealing wolves from Unit 2 (ADF&G 2020a). However, the number of wolf trappers and reported harvests in Unit 2 decreased again from 2020 to 2024 (**Figure 3**). All rural residents are federally qualified subsistence users for Unit 2 wolves. Juneau is the only non-rural community in Southeast Alaska. Ketchikan was non-rural until 2025, when its status changed to rural.

Between 1997 and 2018, the average catch ranged from 1.8-5.5 wolves per trapper, averaging 3.4 wolves per trapper (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Porter 2003). However, in most years, just 2-3 skilled trappers harvest most of the wolves (Schumacher 2019, pers. comm. as cited in OSM 2020). Between 1996 and 1998, ADF&G conducted household harvest surveys in all POW communities (ADF&G 2019e). The communities of Klawock and Craig accounted for 80% of the POW wolf harvest, and <.05% of POW residents attempted to harvest wolves (ADF&G 2019e). Since 2019, the harvest rate has been 2.0 to 3.2 wolves/day with an average of 2.4 wolves/day (ADF&G and USFS 2024).

Unit 2 wolf harvest is primarily monitored through mandatory sealing of pelts (Porter 2018). Harvest primarily occurs on non-Federal lands, including tide lands (ADF&G 2019d, SERAC 2017, Person and Logan 2012). Most wolves are harvested under a combination hunting/trapping license (Schumacher 2019, pers. comm. as cited in OSM 2020). The only wolves known to be taken under a hunting license are harvested from Sept. 1-Nov. 14 before State and Federal trapping seasons open (Schumacher 2019, pers. comm. as cited in OSM 2020). In Unit 2, wolves can be harvested with a firearm under a trapping license under both State and Federal regulations.

Between 1997, when the HGL was initiated (see Regulatory History), and 2018, annual reported wolf harvest ranged from 7-96 wolves, averaging 50 wolves (**Figure 3**) (Schumacher 2019, pers. comm. as cited in OSM 2020). The annual harvest quota was exceeded five times (**Table 1**). Most wolves are harvested using traps and relatively few are shot. Between 1997 and 2018, 21%, 53%, and 25% of harvested wolves were shot, trapped, and snared, respectively (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). In 2019, the first year under the new harvest management strategy without any quotas, the reported wolf harvest was 165 wolves, which is the highest number ever recorded in Unit 2 (ADF&G 2020a). ADF&G (2020a) noted that trapper harvest depends primarily on trapper effort and believes the unusually high harvest in 2019 resulted from a doubling of the normal trapping effort (32 trappers v. the historical average of 14. 5 trappers). In 2021, reported harvest was 64 wolves (ADF&G 2022).

Most of the wolf harvest in Unit 2 has historically occurred in January and February when pelts are most prime and fur prices are highest (Porter 2018). Since 2015 most of the wolf harvest has occurred in December because seasons have closed early by emergency order (ADF&G 2019c). Little harvest occurs before December (Porter 2018, SERAC 2017). Between 1997 and 2014, 60% of wolf harvest occurred in January and February on average (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). Over the same time period, on average 3% of wolves were harvested before December. Between 2015 and 2018, 32% of wolves were harvested before December on average due to seasons closing early (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, Bethune 2012). Between 2011 and 2018, reported wolf harvest in September and October ranged from 0-6 wolves per year, averaging 0.8 wolves per year (Schumacher 2019, pers. comm. as cited in OSM 2020).

Unreported human-caused mortality includes wounding loss, illegal harvest, and vehicle collisions. As part of an ADF&G research program, Person and Russell (2008) estimated unreported human-caused

mortality as 47% of total human-caused mortality. This estimate was based on a study of 55 radio-collared wolves in which 16 of 34 human-caused wolf kills were unreported (Person and Russell 2008). Most of the unreported kills were either shot out of season or killed during open seasons and not reported (Person and Russell 2008). Later in the research program, ADF&G reported three of eight radio-collared wolves that died during their study were not reported, suggesting 38% of human-caused wolf kills are unreported (USFWS 2015, Schumacher 2019, pers. comm. as cited in OSM 2020). Thus, unreported harvest accounts for a substantial portion of wolf harvest in Unit 2, which likely resulted in unsustainable harvest rates in some years (>30% of the estimated population) (USFWS 2015, 2016). USFWS (2016) estimated mean total (reported and unreported) annual harvest as 29%, ranging from 11-53%, and concluded that harvest has impacted the Unit 2 wolf population. However, unreported harvests are implicitly accounted for with the new management strategy as management is based on population estimates and objectives rather than on harvest quotas and reported harvests.

USFWS (2015) notes harvest may explain most of the 2013-2014 population decline if unreported harvest is considered. Relatively easy boat and road access may contribute to high rates of unreported harvest in Unit 2, while the insularity of the population makes it more susceptible to overharvest (USFWS 2015). However, as few wolves in Unit 2 are currently radio-collared, documenting unreported human-caused mortality is difficult and accounting for it when setting harvest quotas was a contentious issue (Porter 2018). Additionally, testimony from federally qualified subsistence users to the Council indicates high levels of illegal harvest are not occurring (SERAC 2017).

In 1999, the wolf season closed early by emergency order for the first time. Afterward, annual reported harvest declined substantially (Person and Logan 2012, Bethune 2012). Similarly, Porter (2003) notes that the number of successful trappers averaged 17 per year from 1999-2001, which was well below the 10-year average of 27 successful trappers per year. Between 2002 and 2014, the number of successful trappers averaged 12 per year (Porter 2018). The threat of early season closures likely discouraged hunters and trappers from reporting their harvests, and harvest data between 1999 and 2018 may be less accurate than harvest data prior to 1999 (Person and Logan 2012).

Since initiating the current harvest management strategy in 2019, harvest rates for Unit 2 wolves have ranged from 2.0-3.2 wolves/day, averaging 2.4 wolves/day. State and Federal managers use catch rates to set season lengths. For example, managers estimated a 31-day season in 2024 would result in 74 wolves being harvested (31 days x 2.4 wolves/day = 74). Sustainability of the population is unlikely to be affected by harvest in a single year. As recent estimates indicate a stable wolf population, managers consider harvest to be sustainably managed (ADF&G 2024).

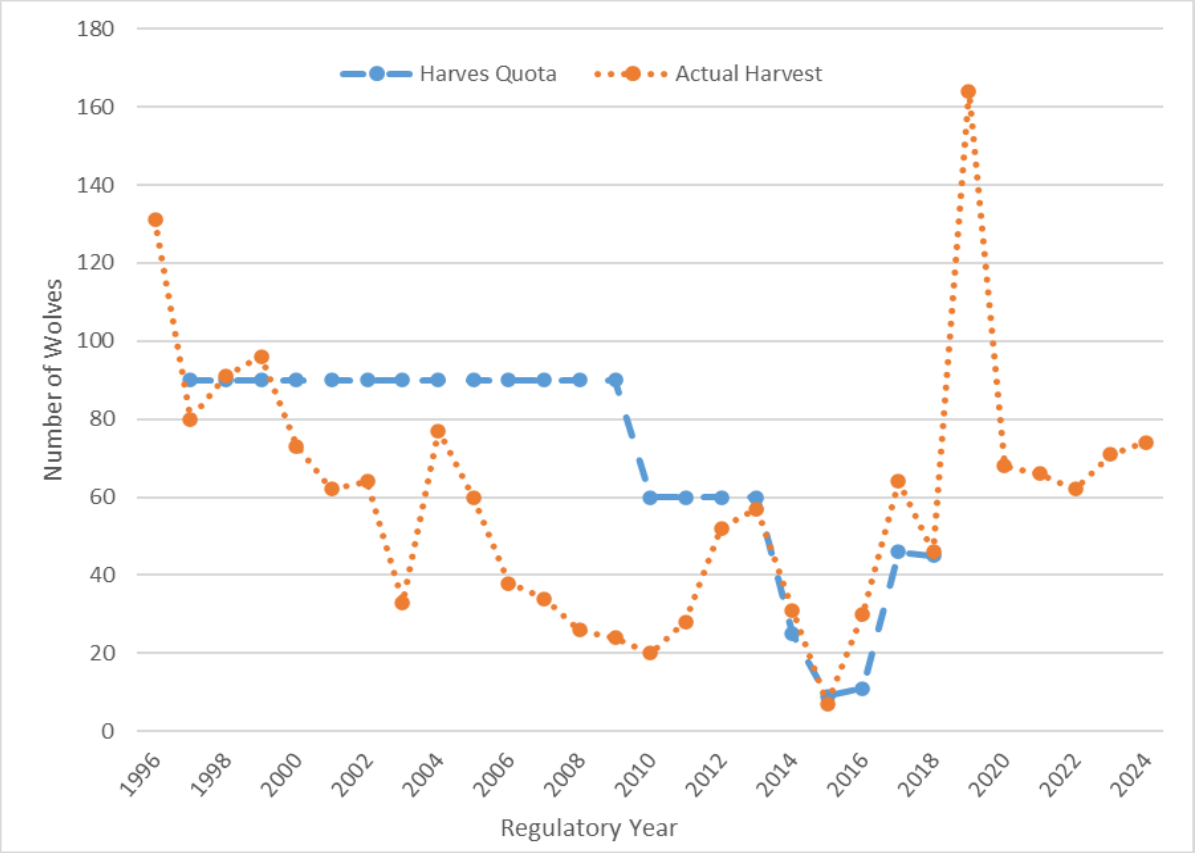

Figure 3. Unit 2 reported wolf harvest and harvest quotas, 1996-2024. Harvest includes reported harvest and other documented human-caused mortality (e.g. vehicle collisions). Quotas were discontinued in 2019 when a new harvest management strategy was implemented (Schumacher 2019, pers. comm. as cited in OSM 2020, Porter 2018, ADF&G 2020a, 2020b, Schumacher 2021, pers. comm, ADF&G 2022; Crupi 2025 pers. comm.).

Discussion and Effects

WP26-09

If WP26-09 is adopted, the wolf trapping season would start one month later, opening December 15th. This may decrease conflicts with other user groups, including deer hunters, waterfowl hunters, and biologists as well as black bears as detailed by the proponent in their submitted proposal. Moving the season opener to December 15th may improve wolf population estimates by reducing the overlap of the trapping seasons with hair-board data collection.

Historically, most wolf harvest in Unit 2 occurred in January and February when pelts are the most prime but have recently occurred in December due to seasons closing early. Moving the start date to December may benefit subsistence users by decreasing conflicts and interference from others and allowing trapping when wolf pelts are in better condition. However, it could also reduce opportunity if

trapping areas are less accessible due to poor weather conditions later in the season. Ultimately, this proposal reduces subsistence opportunity by shortening a potential 4.5-month trapping season to only 3.5 months.

Impacts to the wolf population are uncertain, but expected to be minimal as managers would continue to adjust season lengths to maintain the wolf population within the population objective range. Current harvest rates have supported 31-day seasons. Shifting the season later may affect daily catch rates, resulting in announced seasons to be longer or shorter.

This proposal would also increase regulatory complexity by misaligning State and Federal trapping season dates. It also could create confusion for users and law enforcement by requiring land status to be differentiated if, for example, State trapping seasons are open from Nov. 15-Dec. 15, while Federal seasons are open Dec. 15-Jan. 15. As most wolves are harvested on non-Federal lands, the efficacy of this season change under Federal regulations only would be minimal. However, the proponent indicated they submitted a parallel proposal to the BOG, which will be considered in January 2026.

WP26-10

If WP26-10 is adopted, the Federal wolf trapping season in Unit 2 would become a consistent, guaranteed 47-day season from Nov. 15-Dec. 31, allowing subsistence users to predict and plan trapping opportunities. Increasing the season to 47-days would result in 16 more days of harvest opportunity over the recent 31-day announced seasons. At the estimated harvest rate of 2.4 wolves per day, this would increase harvest by 38 wolves. However, this proposal ultimately reduces subsistence opportunity by shortening a potential 4.5-month trapping season to only 1.5 months.

This proposal is inconsistent with the current harvest management strategy, which adjusts season lengths annually based on wolf population estimates. A guaranteed 47-day season may therefore result in unsustainable wolf harvest if estimates are low, reducing subsistence opportunity in the long-run; or could result in decreased subsistence opportunity and undersubscribed harvests if estimates are high. Recently, announced season lengths have not followed the management strategy guidelines, frustrating users who desire more opportunity and lower wolf populations. Wolf population estimates have been above the population objective range for the past five years, indicating seasons of *up to* 4 months should be announced, rather than the recent 31-day seasons. However, six years of putting the strategy into practice has provided valuable information through experience, informing adaptive management and resulting in ADF&G submitting a Proposal to the BOG to revise the strategy.

This proposal would also increase regulatory complexity by misaligning State and Federal trapping season dates. It also could create confusion for users and law enforcement by requiring land status to be differentiated if, for example, State trapping seasons close December 15, while Federal seasons close 16 days later on December 31. Conversely, State seasons could be open for two months (e.g. Nov. 15-Jan. 15), making Federal regulations more restrictive than State regulations. As most wolves are harvested on non-Federal lands, the efficacy of this season change under Federal regulations only would be minimal.

OSM PRELIMINARY CONCLUSION

Oppose Proposals WP26-09 and WP26-10

Justification

These proposals decrease subsistence opportunity by shortening a potential 4.5 month trapping season to either 3.5 months or 47-days. They are also inconsistent with the current harvest management strategy, which could impact the sustainability of this high-profile wolf population. Fluctuations in harvester effort and success, and unreported and illegal harvest necessitate the use of adaptive management. The Federal in-season manager has the delegated authority to set season lengths, which is done in conjunction with the State. Therefore, both of these proposed changes could be achieved through existing delegated authority. However, as most wolf harvest occurs on non-Federal lands, the efficacy of either of these proposed changes requires coordination with the State. BOG actions on State proposals in January 2026 could affect the impacts and effectiveness of these Federal wildlife proposals.

While seasons have recently opened on November 15th, OSM encourages Federal and State managers to consider shifting the season opening date later in the season to address the concerns of the proponent of Proposal WP26-09. Similarly, OSM encourages Federal and State managers to consider setting season lengths in accordance to those prescribed by the current harvest management strategy. Finally, OSM encourages managers to strongly consider TEK and local subsistence users' knowledge when setting season lengths each year, as requested by the Southeast Council.

LITERATURE CITED

ADF&G. 2003. Wolf management report of survey and inventory activities 1 July 1999-30 June 2002. C. Healy, ed. Juneau, AK.

ADF&G. 2008. Customary and Traditional Use Worksheet, Wolves, Game Management Units 1, 3, 4, and 5, Southeast Alaska. Special Publication No. BOG 2008-09.

ADF&G. 2015. Estimating wolf populations in Southeast Alaska using noninvasive DNA sampling. Federal Aid Final Performance Report. Alaska Department of Fish and Game Wildlife Restoration Grant. AKW-4 Wildlife Restoration FY2015. 14.26.

ADF&G. 2019a. Preliminary action taken. Alaska Board of Game. Southeast Region Meeting. January 11-15, 2019. Petersburg, AK. http://www.adfg.alaska.gov/static/applications/web/nocache/regulations/regprocess/gameboard/pdfs/2018-2019/se/prelim_soa.pdf40B0F4D9C9C4D5EF233B2BE4E7517895/prelim_soa.pdf. Accessed April 29, 2019.

ADF&G. 2019b. Draft Unit 2 Wolf harvest management strategy. RC011. Alaska Department of Fish and Game. http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2018-2019/se/rcs/rc011_ADF&G_Draft_Unit_2_Wolf_management.pdf. Accessed April 30, 2019.

ADF&G. 2019c. Department reports and recommendations. RC4, Tab 6.2. Alaska Department of Fish and Game. http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2018-2019/se/rc4_tab6.2_ktn_pow_props.pdf. Accessed May 1, 2019.

ADF&G. 2019d. Meeting audio. Alaska Board of Game. Southeast Region Meeting. January 11-15, 2019. Petersburg, AK. http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2018-2019/20190111_janse/index.html?mediaBasePath=/Meeting%2001-14-19%20BOG%20%28Jan-18-19%209-58-54%20AM%29#. Accessed May 2, 2019.

ADF&G. 2019e. Community Subsistence Information System. Alaska Department of Fish and Game. http://www.adfg.alaska.gov/sb/CSIS/. Accessed May 9, 2019.

ADF&G. 2019f. Memorandum from B. Mulligan, Deputy Commissioner to A. Christianson, Chair, Federal Subsistence Board on Wildlife Special Action Request 19-02. May 23, 2019. Alaska Department of Fish and Game. Juneau, AK.

ADF&G. 2020a. Advisory Announcement: Trappers harvest record number of wolves on Prince of Wales and associated islands in 2019/20. Alaska Department of Fish and Game. Juneau, AK.

ADF&G. 2020b. GMU 2 Wolf Population Update, Autumn 2019. Memorandum. ADF&G. Douglas, AK. 5pp.

ADF&G. 2021. Meeting audio and Proposal 194 RC4 slides. Alaska Board of Game. Special Meeting. March 18, 2021. Webconference.http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-18-2021&meeting=webconference. Accessed June 8, 2021.

ADF&G. 2022. Regulatory Year 2021 Game Management Unit 2 Wolf Harvest. Advisory Announcement. January 26, 2022. Alaska Department of Fish and Game. Juneau, AK.

ADF&G. 2023. Emergency Order R1-19-23. Alaska Department of Fish and Game. Juneau, AK.

ADF&G. 2003. Wolf management report of survey and inventory activities 1 July 1999-30 June 2002. C. Healy, ed. Juneau, AK.

ADF&G and USFS. 2019. Wolf harvest season announced for GMU 2, new process explained. News Release. Tom Schumacher, ADF&G contact, Regional Supervisor. Paul Robbins, Jr., USFS contact, Public Affairs Officer. Craig, AK.

ADF&G and USFS. 2020a. Public Meeting and Hearing Announced Regarding 2020 GMU 2 Wolf Harvest. News Release. Tom Schumacher, ADF&G contact, Regional Supervisor. Paul Robbins, Jr., USFS contact, Public Affairs Officer. Craig, AK.

ADF&G and USFS. 2020b. State and Federal Subsistence 2020 GMU 2 Wolf Harvest Season Closure Date Announced. News Release. Tom Schumacher, ADF&G contact, Regional Supervisor. Paul Robbins, Jr., USFS contact, Public Affairs Officer. Craig, AK.

ADF&G and USFS. 2021. State and Federal Subsistence 2021 GMU 2 Wolf Season Announced. News Release. Tom Schumacher, ADF&G contact, Regional Supervisor. Carol Lagodich, USFS contact, Public Affairs Specialist. Craig, AK.

ADF&G and USFS. 2023. State and Federal Subsistence 2023 GMU 2 Wolf Season Announced. News Release. Tom Schumacher, ADF&G contact, Regional Supervisor. Paul Robbins Jr. USFS contact, Public Affairs Specialist. Craig, AK.

ADF&G and USFS. 2024. State and Federal Subsistence 2024 GMU 2 Wolf Season Announced. News Release. Tom Schumacher, ADF&G contact, Regional Supervisor. Paul Robbins Jr. USFS contact, Public Affairs Specialist. Craig, AK.

Albert, D.M., and J.W. Schoen. 2007. A conservation assessment for the coastal forests and mountains ecoregion of southeastern Alaska and the Tongass National Forest. Chapter 2 in J.W. Schoen, and E. Dovichin, editors. The Coastal Forests and Mountains Ecoregion of Southeastern Alaska and the Tongass National Forest: A Conservation Assessment and Resource Synthesis. https://www.conservationgateway.org/ConservationByGeography/NorthAmerica/UnitedStates/alaska/seak/era/cfm/Documents/2_Chapter_2.pdf. Accessed May 6, 2019.

Albert, D.M., and J.W. Schoen. 2013. Use of historical logging patterns to identify disproportionately logged ecosystems within temperate rainforests of southeastern Alaska. Conservation Biology 27(4): 774–784

Bethune, S. 2012. Unit 2 wolf management report. Pages 28-38 [In] P. Harper, editor. Wolf management report of survey and inventory activities 1 July 2008-30 June 2011, Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2012-4, Juneau, AK.

Bethune, S. 2015. Unit 2 deer. Chapter 4, pages 4–1 through 4–15 [In] P. Harper and L. A. McCarthy, editors. Deer management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-3, Juneau, AK.

Ballard, W.B., J.S. Whitman, C.L. Gardner. 1987. Ecology of an exploited wolf population in South-central Alaska. Wildlife Monographs 98. Pp. 3-54. https://www.jstor.org/stable/3830566. Accessed May 6, 2019.

Blackman, M.B. 1998. Haida: Traditional Culture. Pages 240-260 in W.C. Sturtevant and W. Suttles, eds. Handbook of North American Indians, Northwest Coast. Smithsonian Institution. Washington, D.C. 777 pp.

Breed, M. 2007. The tale of the dire effects of hunting on wolves in coastal southeast Alaska: loss of genetic diversity, fragmentation, and a regional sink. M.Sc. Thesis. Uppsala University, Norbyvagen, Sweden. 56 pp.

Brinkman, T.J., D.K. Person, F.S. Chapin, W. Smith, K.J. Hundertmark. 2011. Estimating abundance of Sitka black-tailed deer using DNA from fecal pellets. Journal of Wildlife Management 75:232-242. https://www.fs.usda.gov/treesearch/pubs/39610. Accessed May 6, 2019.

Brooks, J.J., S.I. Markegard, S.J. Langdon, D.S.E. Anderstrom, M.G. Douville, T.A. George, M.K. Jackson, S.G. Jackson, T.K. Mills, J.D. Ramos, J.Y. Rowan, T. Sanderson, and C. Smythe. 2024. Indigenous knowledge and species assessment for the Alexander Archipelago wolf: successes, challenges, and lessons learned. Journal of Wildlife Management 88: e22563. https://doi.org/10.1002/jwmg.22563.

Brooks, J.J., S.J. Langdon, D.S.E. Anderstrom, M.G. Douville, T.A. George, M.A. Jackson, S. Jackson, T. Mills, J.D. Ramos, J. Rowan, T. Sanderson, and S. Edenshaw. 2022. Indigenous engagement with the Alexander Archipelago wolf: an applied study of culture and traditional ecological knowledge. Interim Report. USFWS and Sealaska Heritage Institute. Juneau, AK.

Carrol, C.R., J. Fredrickson, and R.C. Lacy. 2014. Developing metapopulation connectivity criteria from genetic and habitat data to recover the endangered Mexican wolf. Conservation Biology 28: 76-86.

Crupi.A. 2025. Regional Supervisor. Personal communication: email. ADF&G. Alaska Department of Fish and Game. Juneau, AK.

De Laguna, F. 1972. Under Mount St. Elias: The history and culture of the Yakutat Tlingit. Smithsonian Contributions to Anthropology Vol. 7. U.S. Government Printing Office. Washington, D.C.

Emmons, G.T. 1991. The Tlingit Indians. Edited with additions by F. de Laguna. The University of Washington Press. Seattle, WA and the American Museum of Natural History, New York, New York.

FSB. 2018. Transcripts of Federal Subsistence Board proceedings. April 12, 2018. Office of Subsistence Management, USFWS. Anchorage, AK.

FSB. 2020. Transcripts of Federal Subsistence Board proceedings. April 21, 2020. Office of Subsistence Management, USFWS. Anchorage, AK.

Fuller, T.K., L.D. Mech, and J.F. Cochrane. 2003. Wolf population dynamics. Pp. 161-191 in Mech, L.D. and L. Boitani, editors. Wolves, behavior, ecology, and conservation. University of Chicago Press, Chicago and London.

Goldschmidt, W.R. and T.H. Haas. 1998. Haa Aani, Our Land: Tlingit and Haida land rights and use. T.F. Thornton, ed. University of Washington Press, Seattle, WA and Sealaska Heritage Institute, Juneau, AK.

Goldschmidt, W.R. and T.H. Haas. N.d. [1946]. Possessory rights of the natives of southeastern Alaska: a detailed analysis of the early and present territory used and occupied by the natives of southeastern Alaska, except the natives of the village of Kake (partially treated), Hydaburg, and Klawock. A report to the Commissioner of Indian Affairs. Bureau of Indian Affairs. Washington, D.C.

Hasbrouck, T. R. 2022. Wolf management report and plan, Game Management Unit 2: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-9, Juneau.

Hasbrouck, T. R. 2023. Deer management report and plan, Game Management Unit 2: Report period 1 July 2016–30 June 2021, and plan period 1 July 2021–30 June 2026. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-16, Juneau.

Hicks, M.V., ed. 1999. Federal aid in wildlife restoration report: deer survey-inventory activities 1 July 1996 – 30 June 1998. ADF&G, Division of Wildlife Conservation. Grants W-24-5 and W-27-1. Juneau, AK.

Larsen, D.N. 1994. Units 1A & 2 Wolves. Pp. 1-8. in Hicks, M., editors. Wolf management report of survey-inventory activities 1 July 1999-30 June 2002. Alaska Department of Fish and Game. Juneau, AK.

Mazza, R. 2003. Hunter demand for deer on Prince of Wales Island, Alaska: An analysis of influencing factors. U.S. Forest Service General Technical Report. PNW-GTR-581

Oberg, K. 1973. The social economy of the Tlingit Indians. University of Washington Press. Seattle, WA. 144 pp.

OSM. 2003. Staff analysis WP03-10. Proposal database. Office of Subsistence Management, USFWS. Anchorage, AK. https://subsistence.fws.gov/apex/f?p=MENU:101:::::. Accessed June 8, 2021.

OSM. 2020. Staff analysis WSA20-08. Proposal database. Office of Subsistence Management, USFWS. Anchorage, AK. https://subsistence.fws.gov/apex/f?p=MENU:101:::::. Accessed June 8, 2021.

Person, D.K. and M.A. Ingle. 1995. Ecology of the Alexander Archipelago wolf and responses to habitat change. Unpubl. Prog. Rep. 3. Alaska Department of Fish and Game. Douglas, AK. http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research_pdfs/95_wo_hab_eco_person_ingle.pdf. Accessed May 6, 2019.

Person, D.K., M. Kirchhoff, V. Van Ballenberghe, G.C. Iverson, and E. Grossman. 1996. The Alexander Archipelago wolf: A conservation assessment. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, General Technical Report PNW-GTR-384, Portland, OR.

Person, D.K., B.D. Logan. 2012. A spatial analysis of wolf harvest and harvest risk on Prince of Wales and associated islands, Southeast Alaska. Final wildlife research report, ADF&G/DWC/WRR-2012-06. Alaska Department of Fish and Game, Juneau, AK. USA.

Person, D.K., A.L. Russell. 2008. Correlates of mortality in an exploited wolf population. Journal of Wildlife Management. 72(7). 1540-1549.

Person, D.K., A.L. Russell. 2009. Reproduction and den site selection by wolves in a disturbed landscape. Northwest Science 83:211-224.

Petroff, I. 1884. Report on the population, industries, and resources of Alaska. Government Printing Office. Washington, D.C. 189 pp.

Porter, B. 2003. Unit 2 wolf management report. Pages 28-38 in C. Healy, editor. Wolf management report of survey and inventory activities 1 July 1999-30 June 2002. Alaska Department of Fish and Game. Juneau, AK.

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 Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-10, Juneau, AK.

Roffler, G.H., J.N. Waite, R.W. Flynn, K.R. Larson and B.D. Logan. 2016. Wolf population estimation on Prince of Wales Island, southeast Alaska: a comparison of methods. Alaska Department of Fish and Game. Final wildlife research report. ADF&G/DWC/WRR-2016-1, Juneau, AK. 58 pp.

SERAC. 2017. Transcripts of the Southeast Alaska Regional Advisory Council proceedings. November 1, 2017. Office of Subsistence Management, USFWS. Anchorage, AK.

SERAC. 2018. Transcripts of the Southeast Alaska Regional Advisory Council proceedings. February 13-14, 2018. Office of Subsistence Management, USFWS. Anchorage, AK.

SERAC. 2019. Transcripts of the Southeast Alaska Regional Advisory Council proceedings. March 19, 2019. Office of Subsistence Management, USFWS. Anchorage, AK.

SERAC. 2025. Transcripts of the Southeast Alaska Regional Advisory Council proceedings. March 18, 2019. Office of Subsistence Management, PMB. Sitka, AK.

Swanton, J.R. 1909. Tlingit myths and texts. Government Printing Office. Washington, D.C. 460 pp.

Toppenberg, J., G. Scott, R. Noblin, D. Beebe, L. Edwards, J. Hanson. 2015. Petition to List on an Emergency Basis the Alexander Archipelago Wolf (Canis Lupus Ligoni) as Threatened or Endangered Under the Endangered Species Act. Center for Biological Diversity. https://www.biologicaldiversity.org/species/mammals/Alexander_Archipelago_wolf/pdfs/Emergency_ESA_petition_for_AA_wolf__14Sep15.pdf. Accessed April 29, 2019.

USDA. 2016. Tongass land and resource management plan, final environmental impact statement. United States Forest Service. R-10-MP-769ef

USFWS. 1995. ETWP; 12-Month Finding for a Petition to List the Alexander Archipelago Wolf as Threatened. 60 FR 10056 10057. February 23, 1995. https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=6987#status. Accessed July 23, 2019.

USFWS. 2015. Species status assessment for the Alexander Archipelago wolf (Canis lupus ligoni). Version 1.0., December 2015. Alaska Region. U.S. Fish and Wildlife Service. Anchorage, AK. 162 pp.

USFWS. 2016. 12-Month Finding on a Petition To List the Alexander Archipelago Wolf as an Endangered or Threatened Species; Notice of 12-month petition finding. 81 FR 435 458. January 6, 2016. https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=6987. Accessed July 23, 2019.

USFWS. 2023. 12-Month Finding on a Petition To List the Alexander Archipelago Wolf as an Endangered or Threatened Species; Notice of 12-month petition finding. FR# 2023-18260. Aug 23, 2023. https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=6987.

U.S. Forest Service. 1989. 1989-94 operating period for the Ketchikan Pulp Company. Long-term sale area, final environmental impact statement. USDA Forest Service. R-10-MB66h.

Weaver, J.L., P.C. Paquet, and L.F. Ruggiero. 1996. Resilience and conservation of large carnivores in the Rocky Mountains. Conservation Biology 10:964-976.

Wolf, Shaye, R. Spivak. L. Edwards, P. Lavin. 2020. Petition to list the Alexander Archipelago Wolf (Canis Lupus Ligoni) in Southeast Alaska as threatened or endangered under the U.S. Endangered Species Act. Center for Biological Diversity, CA. https://www.biologicaldiversity.org/species/mammals/Alexander_Archipelago_wolf/pdfs/20-07-15-Petition-to-list-the-Alexander-Archipelago-wolf-in-Southeast-Alaska-under-the-ESA.pdf.

Wolf Technical Committee. 2017. Interagency wolf habitat management program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.

APPENDIX 1

Federal Subsistence Board

1011 East Tudor Road, MS121
Anchorage, Alaska 99503-6199

FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

FOREST SERVICE

OCT 1 1 2018

OSM 180089.CM

Craig District Ranger
Tongass National Forest
P.O. Box 500
Craig, Alaska 99921

Dear Craig District Ranger:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Craig District Ranger to issue emergency or temporary special actions if necessary to ensure the conservation of a healthy wildlife population, to continue subsistence uses of wildlife, for reasons of public safety, or to assure the continued viability of the population. This delegation only applies to the Federal public lands subject to Alaska National Interest Lands Conservation Act (ANILCA) Title VIII jurisdiction within the Craig Ranger District of the Tongass National Forest for the management of deer and wolves on these lands.

It is the intent of the Board that actions related to the management of deer and wolves by Federal officials be coordinated, prior to implementation, with the Alaska Department of Fish and Game (ADF&G), representatives of the Office of Subsistence Management (OSM), and the Chair of the affected Council(s) to the extent possible. The Office of Subsistence Management will be used by managers to facilitate communication of actions and to ensure proposed actions are technically and administratively aligned with legal mandates and policies. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair or alternate, local tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. **Delegation:** The Craig District Ranger is hereby delegated authority to issue emergency or temporary special actions affecting deer and wolves on Federal lands as outlined under the **Scope of Delegation**. Any action greater than 60 days in length (temporary special action) requires a public hearing before implementation. Special actions are governed by Federal regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: "The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board."

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the following authorities within the limits set by regulation at 36 CFR 242.26 and 50 CFR 100.26.

- You may set harvest quotas, and close, reopen or adjust Federal subsistence deer seasons and to adjust harvest and possession limits for that species. You may also close Federal public lands to the take of this species to all users.

- You may close, reopen, or adjust the Federal hunting and trapping season for wolves.

This delegation also permits you to close and reopen Federal public lands to nonsubsistence hunting, but does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed hunts.

This delegation may be exercised only when it is necessary to conserve deer and wolf populations, to continue subsistence uses, for reasons of public safety, or to assure the continued viability of the populations. All other proposed changes to codified regulations, such as customary and traditional use determinations or adjustments to methods and means of take, shall be directed to the Board.

The Federal lands subject to this delegated authority are those within the Craig Ranger District of the Tongass National Forest.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Delegation: You will become familiar with the management history of the wildlife species relevant to this delegation in the region, with current State and Federal regulations and management plans, and be up-to-date on population and harvest status information. You will provide subsistence users in the region a local point of contact about Federal subsistence issues and regulations and facilitate a local liaison with State managers and other user groups.

You will review special action requests or situations that may require a special action and all supporting information to determine: (1) consistency with 50 CFR 100.19 and 36 CFR 242.19, (2) if the request/situation falls within the scope of authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected Federally qualified subsistence users and non-Federally qualified users. Requests not within your delegated authority will be forwarded to

the Board for consideration. You will maintain a record of all special action requests and rationale for your decision. A copy of this record will be provided to the Administrative Records Specialist in OSM no later than sixty days after development of the document.

For management decisions on special actions, consultation is not always possible, but to the extent practicable, two-way communication will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Government to Government Tribal Consultation Policy (Federal Subsistence Board Government to Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claim Settlement Act Corporations 2015).

You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair(s) or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency and temporary special actions being considered. You will ensure that you have communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal Subsistence regulations and policy, and that the perspectives of the Chair(s) or alternate of the affected Council(s), OSM, and affected State and Federal managers have been fully considered in the review of the proposed special action.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you will seek Council recommendations on the proposed temporary special action(s). If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify the public, OSM, affected State and Federal managers, law enforcement personnel, and Council members. If an action is to supersede a State action not yet in effect, the decision will be communicated to the public, OSM, affected State and Federal Managers, and the local Council members at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponent of the request immediately. A summary of special action requests and your resultant actions must be provided to the coordinator of the appropriate Subsistence Regional Advisory Council(s) at the end of each calendar year for presentation to the Council(s).

You may defer a special action request, otherwise covered by this delegation of authority, to the Board in instances when the proposed management action will have a significant impact on a large number of Federal subsistence users or is particularly controversial. This option should be exercised judiciously and may be initiated only when sufficient time allows for it. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated regulatory authority for the specific action only.

6. Support Services: Administrative support for regulatory actions will be provided by the Office of Subsistence Management.

Sincerely,

Anthony Christianson
Chair

Enclosures

cc: Federal Subsistence Board
Assistant Regional Director, Office of Subsistence Management
Deputy Assistant Regional Director, Office of Subsistence Management
Subsistence Policy Coordinator, Office of Subsistence Management
Wildlife Division Supervisor, Office of Subsistence Management
Subsistence Council Coordinator, Office of Subsistence Management
Chair, Southeast Alaska Subsistence Regional Advisory Council
Commissioner, Alaska Department of Fish and Game
Forest Supervisor, Tongass National Forest
Special Agent in Charge, Law Enforcement and Investigations FS (Region 10)
Special Assistant to the Commissioner, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record