

The Klawock, AK Fish and Game Advisory Council is grateful for this opportunity to participate in the public process about resource management in our state.

On July 15, 2020, the Center for Biological Diversity, Alaska Rainforest Defenders and Defenders of Wildlife petitioned the Secretary of Interior/US Fish and Wildlife Service (USFW) to list the Alexander Archipelago (AA) Wolf in Southeast Alaska as threatened or endangered under the U.S. Endangered Species Act. The first petition to list the AA wolf was filed in 1993. The second was filed in 2011. The third and current one was filed in 2020 also requests that critical habitat be designated for AA wolves in Southeast Alaska. The document can be found at [www.biologicaldiversity.org](http://www.biologicaldiversity.org) and [www.doi.gov](http://www.doi.gov). We would like to state that the recurring petition process takes time away from resource managers studying wolf populations and other important issues and is disruptive for certain residents. The signatories of this document believe that the AA wolf should not be listed under the Endangered Species Act.

Prince of Wales Island, the third largest island in the United States, is home to approximately 3500 residents that reside in twelve rural communities, ranging from 35 in remote Point Baker to over 1000 in Craig. Many residents rely largely on a subsistence way of life. Subsistence in rural Alaska means legally that residents can fish and hunt under bag limits that allow us to fill our freezers and pantries because we do not have access to goods and services that people who live in urban areas have. Traditional subsistence lifestyles have been and still are practiced by the Tlingit, Haida and Tsimshian people who have lived here since time immemorial. Prince of Wales area census data from 2021 shows 41.6% Alaska Native residents, almost half the population in POW's communities.(1) Subsistence is a very important part of Alaska Native culture, tradition and heritage.(2) Deer hunting, as a major part of the subsistence lifestyle, is vitally important on POW. Our relationships, mental and physical health and food security are all improved by deer hunting. Deer hunting on POW is more important because this is the only populated area in the region with just one ungulate game animal; POW does not have caribou, moose, elk, sheep, bison, mountain goat or muskox.

Today, subsistence on POW is critical in terms of food security, as soaring inflation nation-wide has increased the cost of all goods and services. Shipping chilled or frozen food here costs \$0.82/lb. In Klawock this week, a gallon of milk is \$6.49, a dozen eggs are \$5.19, and ground beef is \$5.99 per pound. Additionally, gas is currently \$5.87/gal and \$6.23/gal diesel. The bottom line is that food and fuel costs are a much larger percentage of the family budget than average.

Information presented by Alaska Department of Fish and Game (ADFG) and other agencies at the 2022 Deer Summit on POW (October 13-15, 2022) show that the deer population has obviously declined in the past ten years. In 2012, hunters in Unit 2 averaged about 3.5 days of hunting effort per deer harvested; in 2022, hunters spent an average of 4.9 days trying to harvest a deer, according to hunt report survey data from 2012-2021.(3)

We acknowledge that the deer population is affected by numerous factors, including habitat loss from fifty years of industrial scale old-growth logging on POW.(4) We have noticed that, while ADFG reports link POW old-growth forest to healthy deer populations and state that the POWA deer population is in trouble, (5) Division of Forestry staff continue to describe the old-growth stands they cut here as low value and minimize their importance to deer and to hunters. (6) That doesn't agree with what we heard at the 2022 Deer Summit. We also acknowledge there is work to be done in terms of considering changing deer bag limits or seasons in response to population concerns.

While we acknowledge that POW is not the only place where the AA wolf exists, we do know that effects of management actions are felt more sharply on our island; in part, because it is an island. We have seen more wolves more frequently over the past decade, so we have questions about whether this trend is occurring in other places within the AA wolf's range. ADFG has been cautious and conservative, but to accurately assess the population of wolves in a temperate rainforest has always been difficult. As ADFG continues to refine the methodologies used to estimate and balance populations with carrying capacity, we expect the wolf population will remain healthy. We know the AA wolf is a top predator of Sitka blacktail deer and is far from being endangered. Our personal observations and trends in ADFG data lead us to believe the wolf is thriving in our area. Recent harvests of wolves (7) have shown that past estimates were much lower than current numbers reflect.

If the AA wolf is listed under the Endangered Species Act, the federal government will assume authority over management, which will end legal trapping and hunting of wolves. If deer populations are decreasing, it doesn't make sense to list one of its top predators as endangered unless there is credible science and data that show good cause. ADFG has a growing list of data and science, including its own studies here on POW, proving the AA Wolf should not be listed under the Endangered Species Act.(8)

Everyone agrees that wolves are an important part of POW and we enjoy seeing them, hearing them or just knowing that they exist here. However, listing the AA wolf as endangered will not accomplish better management and will

eliminate all legal take of the top non-human predator in an island ecosystem where Sitka blacktail deer is the only ungulate prey available.

We strongly oppose listing the AA wolf as endangered or threatened.

The Klawock ADFG Advisory Council

The following list also supports the above letter

Kurt Whitehead & Trina Nation Treasure Hunter Lodge Klawock, AK	Alaska Outdoor Council Anchorage, AK	Clinton Cook Sr. Tribal President Craig Tribal Association Craig, AK	Scott Van Valin Heidi Van Valin Island Air Express El Capitan Lodge
David & Cynthia Egelston Alaska Rainforest Adventures Thorne Bay, AK	Josh & Chace Anderson Fireweed Lodge Klawock, AK	David and Jen Creighton Shelter Cove Lodge Rainforest Auto Rentals Craig, AK	Chuck & Jeanette Haydu Kingfisher Lodge & Charters Craig, AK
DJ & Anne Hansen DJ's Alaska Adventure Rentals Klawock, AK	Ray & Elizabeth Douville F/V Faith Faith Fisheries Craig, AK	Ellen Hannan & Brian Castle F/V Renegade Craig, AK	Kirk & Katie Agnitsch Sure Strike Lodge Craig, AK
Mark & Beth Farrar Eagles Wings Wilderness Lodge Klawock, AK	James Heppe Jr. Heppe & Sons Construction Klawock, AK	Grace Heppe Heppe's Indoor Edition Klawock, AK	Rosey & Lisa Roseland The Salt Shack Thorne Bay, Alaska
Sam & Michelle Peters Slammin' Sam's Charters POW Electric & Repair Klawock, AK	Tim O'Conner F/V Virginia Rose Craig, AK	LeRoy & Tanya Johns F/V Chelsea Dawn Klawock, AK	Spencer & Hannah Richter F/V Resolution Craig, AK
Vaughn & Carrie Skinna F/V Annalyn Klawock, AK	Phillip & Danel Winrod F/V Aurie G Thorne Bay, AK	Shawn & Jill Kato-Yates F/V Nauti Lady Klawock, AK	Jason Clowar/Luther Jenson Adventure AK Southeast Thorne Bay, AK
Brad McMillan TTP Director Klawock Cooperative Assoc. Klawock, AK	Rob & Val Steward Changing Tides Inn Klawock, AK	Sean Tomkinson Passages Alaska Adventure Therapy, Klawock, AK	Don & Teresa Busse Trophy Inn Klawock, AK
Ann Williams Klawock, AK	Jon & Debbie Winrod Webster Point, AK	Enoch & Elizabeth Winrod Ketchikan, AK	Sam Sawyer Thorne Bay, AK
Brian Ringeisen Anglers-Adventures Ketchikan, AK	Mike & Jan Bush B-3 Contractors Inc. Klawock, AK	John & Sheri Wylie Klawock, AK	Matt & Pam Beck Whale Pass, AK
Chris Guggenbickler Wrangell, AK	Nichole Pope Naukati, AK	Kyle Berg & Courtney Nase Ketchikan, AK	Sharon Toman Whale Pass, AK
Clay Bezenek Ketchikan, AK			