

To Whom it may concern,

We the members of the East Prince of Wales Fish and Game Advisory Council request that the wolves that inhabit Prince of Wales and adjacent islands in southeastern Alaska not be listed as “Threatened” or “Endangered” at this time. A decision to “list” wolves would jeopardize the involvement of both residents and State managers in wolf and wolf prey species management. Many residents would likely not support control of local wildlife management decisions by distant federal managers which could risk the success of any wildlife management strategy. We think the best way to sustain a genetically viable wolf population and an abundant deer herd is to not list the wolf and continue to find and refine the “best available science” in a continuing partnership between wildlife managers and residents.

A 2015/2016 effort by ADFG researchers to quantify wolf populations using genetic analysis from collected hair samples initially suggested wolves had been almost exterminated by hunting and trapping activity that winter. Subsequent observation by local people (primarily by wolf trappers) and analysis of additional research data proved wolf numbers were much larger than estimated. It now appears the wolf population is quite healthy even though the deer population appears (mostly from anecdotal evidence) to be in decline. The 2015/2016 initial data along with perceptions of a dwindling deer herd and increased pressure from people on wolves have since been used as reasons for listing the wolf.

The 2020 census for the POW – Hyder census area showed an increase of only about 3.5%, less than 200 extra people in 10 years. Recent logging road closures and continued restrictions on building new roads on Forest Service Lands (via the “Travel Management Rule” and the “Roadless Rule”) along with access restrictions for travel on Native Corporation lands will tend to decrease human pressure on wolves and deer for the foreseeable future.

We think a genetically sustainable wolf pack is compatible with and probably necessary for a healthy deer herd. The truth is we presently don’t know the relative abundance of wolves, or wolf prey, on southeast Alaska islands. We are just now discovering the extent wolves prey on animals other than deer such as bear, beaver, fish, and both river otter and sea otter, suggesting that wolves are more resilient than we knew, even when deer numbers are relatively low. Research techniques such as genetic sampling is steadily improving our understanding of local wildlife population dynamics.

We think continued improvement to analysis techniques along with field observation by residents is important to understanding wildlife populations. Observations and photo evidence by island residents lead us to think there are presently enough wolves to sustain a viable wolf population throughout Prince of Wales and adjacent islands. Listing the wolf based on limited and possibly flawed scientific data is premature and would only disrupt the wildlife management system that has worked well so far and is supported by residents.

Thank you for considering our comments,

The East Prince of Wales Fish and Game Advisory Council

