

Alaska Department of Fish and Game Comments

Wildlife Proposal WP26-10

This proposal would change the Game Management Unit (GMU) 2 wolf trapping season from Nov. 15–Mar. 31 to Nov. 15–Dec. 29.

Position

The Alaska Department of Fish & Game (ADF&G) is **OPPOSED** to this proposal. Reducing the season length to 45 days would limit the adaptive management strategy that is currently in place. The season spanned 31 days from regulatory years (RY) 2021–RY2024, but if catch rates decrease, the wolf population increases, or other factors allow for additional harvest, the Federal Subsistence Board (FSB) would need to increase the season length in regulation to allow for a longer season.

The intent of this proposal is to require a minimum season length of 45 days, not to shorten the season to 45 days from the current 137-day length. The idea is to have a minimum season of 45 days instead of the shorter seasons previously implemented by the ADF&G and USFS through emergency orders. ADF&G understands that trappers desire a longer wolf trapping season, however, at this time, a conservative approach to management is necessary until further research is conducted and finalized to determine if a longer season length is sustainable.

Background

During the Board of Game's (BOG) 2019 meeting, the BOG aligned the GMU 2 state wolf trapping season with the federal season. This changed the start date of the trapping season from Dec. 1 to Nov. 15. This alignment alleviated trappers' frustrations over different start dates on different land ownerships (federal and non-federal). At the same meeting, the BOG endorsed ADF&G's new management strategy which changed from a harvest quota to a season length-based strategy.

This adaptive approach to management allows the season length to be altered based on the most recent information available for wolves in Unit 2. From RY2019 to present, ADF&G altered the trapping season based on the most recent population estimate, catch rate, and other factors to allow for sustainable harvest of wolves. The hunting and trapping seasons are closed at the same time with an emergency order which is posted before the start of the trapping season. This allows trappers to plan for the trapping season. The trapping season length varied from 62 days in RY2019 to 21 days in RY2020 and from RY2021–RY2024, the trapping season spanned 31 days. Catch rates from RY2019–RY2024 averaged 2.4 wolves per day which is factored into the season length determination. The population estimate is also considered for the determination of the season length and varied between RY2019–RY2023 from 238 to 386 wolves (Figure 1). The highest harvest was in RY2019 with 164 wolves, after which ADF&G used their adaptive management strategy and decreased the season length following RY2019. From RY2021–RY2024 harvest stabilized, ranging from 62 to 74 wolves.

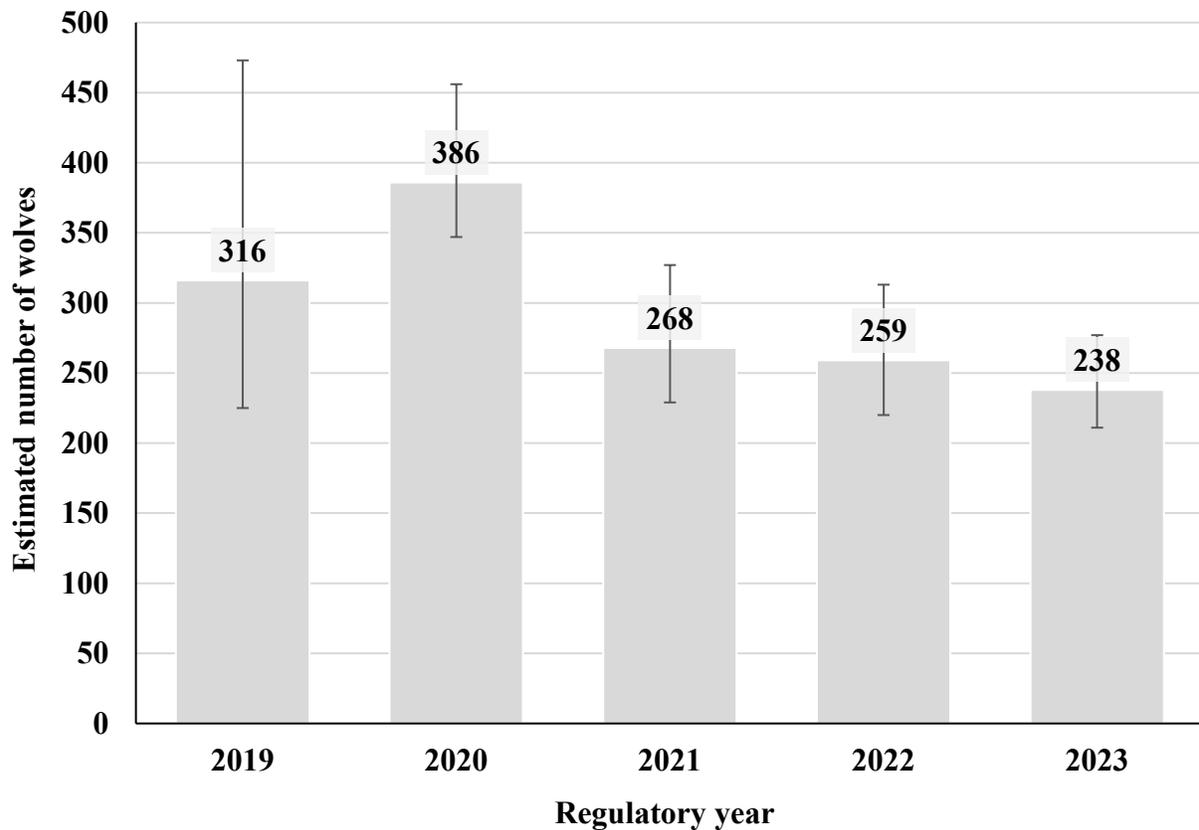


Figure 1.–Game Management Unit 2 wolf population estimates and associated 95% confidence intervals from regulatory year 2019 to 2023.

Impact on Federally Qualified Users

If adopted as written, this proposal would reduce the wolf trapping season from its current 137-day season to 45 days. Emergency order closures from RY2021–RY2024 closed the season on Dec. 15 each year for a 31-day season. If additional trapping opportunity were available, a 45-day season may limit the adaptive management strategy in place and reduce harvest opportunity.

Impact on Other Users

If additional harvest opportunity were available in the future, an emergency order may be issued with a season longer than 45 days. A longer season may benefit non-federally qualified users and disadvantage federally qualified users because federally qualified users would be limited to a 45-day season.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Game (BOG) has made a positive customary and traditional use findings for wolves in Unit 2.

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the Board of Game to determine the amount of the harvestable portion of a game population that is reasonably

necessary for customary and traditional uses. This is an ANS. The BOG does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOG with guidelines on typical numbers of animals harvested for customary and traditional uses under normal conditions. Hunting regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: hunting regulations, changes in animal abundance or distribution, or changes in human use patterns, just to name a few.

The BOG has not established an ANS for wolves in Unit 2.

Trapping regulations:

<u>Unit/Area</u>	<u>Bag Limit</u>	<u>Open Season</u>	
		<u>Resident</u>	<u>Nonresident</u>
2	<i>no limit</i>	<i>Nov. 15–Mar. 31</i>	<i>Nov. 15–Mar. 31</i>

Conservation Issues

This proposal is not likely to cause conservation issues with the wolf population in GMU 2.

Enforcement Issues

If season dates differed between federal and state seasons on federal and non-federal lands this could cause confusion among trappers and issues for law enforcement.