

American Society of Mammalogists

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24 August 2015

Tim Towarak
Chair, Federal Subsistence Board
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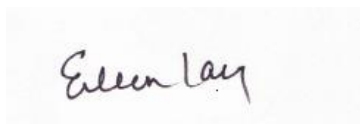
Dear Mr. Towarak:

On behalf of the American Society of Mammalogists (ASM), the world's oldest and largest professional society devoted to the scientific study of wild mammals, I am forwarding to you a position letter prepared by ASM last month that outlines our emergency conservation recommendations for the highly vulnerable population of the Alexander Archipelago wolf. In addition to the primary recipient, this letter was also sent to the Alaska Regional Forester (USFS), the Alaska Director of the US Fish and Wildlife Service (FWS), the Juneau Field Office of FWS, and the Commissioner of the Alaska Department of Fish and Game.

We agree with the request made in the 22 July letter to you from Mr. Stewart (Tongass NF Supervisor) to close the federal season on wolves in GMU-2 in the Prince of Wales (POW) area, due to an alarming 60% decline from 2013 to 2014 in the estimated fall wolf-population. This brought the population to an estimated 89 animals, but the lower end of the 95% confidence interval on that estimate suggests that as few as 50 animals may have existed as of fall 2014. The subsequent 29 additional wolves reported as harvested plus an unknown number of other mortalities raises the possibility that the ecologically and genetically unique POW wolf population could now be perilously low and therefore unable to sustain additional human-caused mortality.

The only way to ensure that no further—and perhaps irreparable—harm is done to the POW wolf population (at least until further study can be completed to assess the current status and trajectory) is to cease all sanctioned harvest of this population. Therefore, we extend the request made in the attached letter of 7 July to include closure of the federal as well as the state subsistence hunting and trapping season. To accomplish this, we strongly urge that the FSB (1) immediately issue an emergency special action to NOT open the 2015 wolf season in POW GMU-2 and (2) promulgate a temporary special action that will close the federal season in GMU-2 until such time as it can be proven that the population has recovered and is not at risk of extirpation. To this end, we ask that this letter be read at the public hearing on 27 August 2015 and that our attached position letter also be included in the public record of that hearing.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Eileen Lacey".

Eileen A. Lacey, Ph.D.
President, American Society of Mammalogists

