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Earl Stewart, Forest Supervisor
Tongass National Forest
648 Mission Street
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Ketchikan, AK 99901-6591

Dear Mr. Stewart:

The American Society of Mammalogists (ASM) is a non-profit, professional, scientific, and educational Society consisting of nearly 3,000 members from all 50 United States and 60 other countries worldwide. The ASM was founded in 1919 and is the world's oldest and largest organization devoted to the study of mammals. We strongly support the conservation and responsible use of wild mammals based on current, sound, and accurate scientific knowledge. The Society has a long history of reviewing issues related to mammalian conservation, and where appropriate, adopting positions on issues concerning the conservation and responsible management of mammals and their habitats based upon our scientific expertise.

The ASM is concerned about the conservation of the Alexander Archipelago wolf (*Canis lupus ligoni*), a taxon of concern in southeastern Alaska since the 1980s (Person et al. 1996, USFS 1997, 2008; USFWS 1997; USFWS 2014). This subspecies is a geographically, morphologically, and genetically distinct form of the gray wolf (*C. lupus*) that is endemic to southeastern Alaska and constitutes a significant portion of the genetic diversity of *C. lupus* in North America (Goldman 1937, 1944; Person et al. 1996; Weckworth et al. 2005, 2010, 2011, 2015; Munoz-Fuentes et al. 2009; Cronin et al. 2015). The Alexander Archipelago wolf is one of many endemic taxa in southeastern Alaska (MacDonald and Cook 2007; Cook et al. 2006; Cook and MacDonald 2013) and thus this region should be a priority for conservation efforts.

At present, the Alexander Archipelago wolf (*Canis lupus ligoni*) is being considered by the U.S. Fish & Wildlife Service (USFWS) for protection under the Endangered Species Act (ESA) as a threatened or endangered species, with a positive 90-day finding that listing “may be warranted” having been issued (USFWS 2014). One of the areas of greatest conservation concern for *C. l. ligoni* is the population located on Prince of Wales Island, the third largest island in the U.S. (after Hawaii and Kodiak Islands). The Prince of Wales Archipelago (POWA) wolves are geographically and genetically isolated from other populations of *C. l. ligoni*, and are one of the most threatened segments of the subspecies. Based on radio-telemetry (Person et al. 1996), the POWA population was estimated to be 250-350 in the mid-1990s; however, a decline in these animals was noted beginning around 2008 (Person 2010). In 2010, the Alaska Department of Fish & Game (ADFG) resumed fieldwork that included radio-telemetry and other census methods in the central POWA and, over the next few years, it documented few wolves and little wolf sign (Person 2010). In 2013, ADFG documented 80% mortality within their central POWA study area (Person and Larsen 2013). Since that time, reduced harvest quotas have failed to slow population declines, resulting in a midrange population estimate for POWA of 89 individuals during 2015 (ADFG 2015b). Telemetry studies have shown the impact of illegal harvest on this population to be substantial, affecting as much as 19% of the population (Pearson and Russell 2008). The additive impact of illegal harvest and the failure to incorporate this effect into harvest quotas is likely responsible for the observed population decline.

Human access provided by the high density (ca 4,500 km) of logging roads in POWA is directly related to high wolf mortality in the area and particularly the illegal take of wolves (Person and Russell 2008; Person 2013, 2014). The primary prey of wolves is Sitka black-tailed deer, and the perceived competition between hunters and wolves for deer is one cause for the unsustainable human take of wolves on POWA (Farmer and Person 2000; Brinkman 2009, Brinkman et al. 2009; Person and Russell 2008; Person 2013, 2014). This competition is already an important mortality factor for wolves and deer numbers are expected to plummet as a result of the “succession debt” resulting from past, current, and planned logging, with former old-growth forest (important winter deer habitat) becoming essentially useless to deer for at least 30 years (Person and Brinkman 2013) and possibly for as long as 150 years after logging (Hanley et al. 1984).

Despite this evidence, the U.S. Forest Service (USFS) claims that further increases in the density of logging roads and further losses to logging of the old-growth habitat preferred by deer are not problematic for *C. l. ligoni*. This USFS perspective is exemplified by its Big Thorne timber project in central Prince of Wales Island, the agency’s largest timber sale on the island in over 20 years, which will result in 148 million board feet of timber being taken from 6,000 acres of old-growth forest (USFS 2013). ASM strongly disagrees with this renewed policy of old-growth logging and with the claim that it will have no effect on deer or the wolves that prey on them (see ASM 2015). Our concerns about negative impacts extend to two other endemic mammals of the archipelago—the Prince of Wales Island flying squirrel (*Glaucomys sabrinus griseifrons*) and a genetically distinct lineage of *Mustela erminea* (Demboski et al., 1998; MacDonald and Cook 2007, Bidlack and Cook 2001; 2002; Dawson et al., 2014). The Prince of Wales Island flying squirrel is especially dependent on old-growth forest stands (Smith and Nichols 2003; Smith et al. 2004; Flaherty et al. 2008; 2010) and is thus likely to be particularly impacted by the planned logging activities.

As a result, the American Society of Mammalogists calls upon: (1) The Alaska Department of Fish & Game to issue an emergency order (EO) closing Game Management Unit 2 (GMU2) to the hunting, trapping or other take of wolves until the wolf population there can be verified to exceed a minimum estimate of 200 animals; (2) the U.S. Forest Service to cease the construction of new roads and clearing of old growth forests on its lands within GMU2, including those of the Big Thorne project; and (3) the USFWS to protect under the Endangered Species Act (ESA) the Alexander Archipelago wolf (*C. l. ligoni*) as threatened or endangered due to the significant threats to this taxon outlined above.

In summary, we believe that the circumstances as outlined above require immediate action on the part of ADFG, USFS, and USFWS in order to conserve this unique subspecies of the gray wolf, especially on Prince of Wales Island. The ASM greatly appreciates your careful consideration of our comments and suggestions on this critical issue and stands ready to lend our collective expertise to help you resolve this issue.

Sincerely,

A handwritten signature in black ink that reads "Eileen Lacey". The signature is written in a cursive style and is centered within a light gray rectangular box.

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

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