

Attn: FWS-R7-ES-2012-0093
Division of Policy and Directives Management;
U.S. Fish and Wildlife Service;
4401 N. Fairfax Drive, MS 2042-PDM;
Arlington, VA 22203.

Hello,

The USFWS has a hard job—and to determine if listing the Alexander Archipelago wolf is warranted in SE Alaska under the Endangered Species Act (ESA), requires a unique overview that your Agency is abundantly capable of. It is my understanding that in 2004 when I started working on the Tongass National Forest—there were about 90 wolves in the approximate area between Thorne Bay, Coffman Cove and Naukati and on down to Craig. Now according to I understand about current monitoring reports there may be as few as three wolves remaining in this area. This apparently means there are no viable packs of Alexander Archipelago wolves in this area any longer. All remaining wolves are juvenile animals and may not be able to form packs in the near future if at all. I understand as well that there are of course intact packs of wolves outside this area on Prince of Wales Island and adjacent islands.

Your Agency's finding to consider listing of the listing the Alexander Archipelago wolf in SE Alaska has come about by my own estimation, through largely three factors I am aware of:

- 1) Federal timber management—Federal Timber management by the U.S. Forest Service is a proposed action driven process that is geared mostly to supply timber to private enterprise. This is an authority given the U.S. Forest Service by the Multiple Use and Sustained yield Act of 1961 and other applicable Federal law. The Tongass National Forest Land and Resource Management Plan counts its sustainability throughout the Alexander Archipelago that comprises the Tongass National Forest and does not look island by island, at endemic populations that are vital when considering extinctions on islands. It is well documented that extinctions occur readily in island environments, should the composition of ecosystem significantly change (e.g. *The Theory of Island Biogeography* Robert H. MacArthur & Edward O. Wilson).
- 2) Alaska State game management—Alaska State game management through Department of Fish and Game with regulation made by the State Board of Game, manages for a different species of wolf outside the Alexander Archipelago as well as the Alexander Archipelago wolf and does not differentiate in rules and regulation north to south where this species differentiation occurs.
- 3) A number of local residents on Prince of Wales Island view the wolf as vermin and a threat to their own subsistence hunting of deer.

The erroneous view of the wolf as having no place in the ecosystem by Prince of Wales Island residents has resulted in significant quasi-legal hunting and trapping with an inordinate take by some residents setting wolf snares with no intention of harvesting the fur of the animals, but rather an intention to kill the wolves wantonly. These actions are not shared with most hunters and trappers on Prince of Wales Island—who disdain the efforts of those that want to eradicate the Alexander Archipelago wolf. In almost a decade of residing on Prince of Wales Island I've seen the stenciled logos on pickups of a "Wolf Eradication patrol," (or some variation on this phrase) with a cartoon picture of a wolf with a circle and strike through on it. I several times heard second hand reports that this was going on. Some fur sealers have known it was going on (decomposed carcasses being brought to them). Biologists and trappers have been finding decomposing wolves in snares. Reports of wolves being shot and left to decompose exist. A State DNR Biologist had vociferously complained about this situation for over a decade; despite the dwindling numbers of wolves, the State did not adjust harvest. The Forest Service while mentioning it did not use it as a factor in wolf population estimates. Numerous anecdotal reports such as these readily exist, some of which I've seen in project records of planning reports, many of which I assume your Agency is aware of. At some point these anecdotes, though diversely documented, must be counted as data.

Particularly when the story prevails over time as this has—it must be considered as data when coupled with inductive and deductive data of the present population decline. You may then with good conscience use abductive reasoning to come to a conclusion under ESA regulations, while conducting a review of the status of the species to determine if the listing of the Alexander Archipelago wolf is warranted. My comment is largely to encourage you to do so.

Alaska trapping regulations prohibit wanton waste of fur bearing animals, but because harvested animals in northern parts of the state stay frozen with viable fur for sometimes more than a month or perhaps two and even longer; there is no requirement for regular checking of traps. In the warmer southern areas of the State where an irregular and lengthy checking cycle practice results in a decomposed animal and no viable harvest of fur—there is no means to prosecute this wanton waste of game and furbearers. Yet, snares and leg hold traps are set apparently in prolific numbers; and some cases are set by those who want to eradicate the wolf. In many cases these traps are never checked, or checked purposely long after the animal is dead. It is my thought that if this has been documented there is criminal intent here, even if these actions cannot be effectively prosecuted. Despite the dwindling number of acres of deer winter range, due to five decades of clear cut timber harvest, it is my estimation the Forest Service has not taken the hard look, nor fully considered the consequences of harvesting deer winter range as it relates to the impending decline of the wolf population and the potential state of deer winter range and consequent future deer populations. Only recently has there been a joint Federal and State effort determining the actual wolf population and its dire state. The facts of all this is public record and the recent environmental documents deftly show existing conditions—I know that you are expertly considering all this data. That your Agency has the ability to come to different conclusions than the agencies responsible for land management and wildlife management, if warranted— is indeed a wonderful thing about our nation and its laws.

I do understand that the Sitka Blacktail fawn survival in 2010-2011 in this area was perhaps less than 10%. These were severe winters. A number of severe winters in a row will cause the deer population to decline—because of clearcuts and stem excluded stands that deer cannot migrate out of these areas due to deep snow. Despite global warming it appears there is science concerning Pacific Decadal Oscillation and the El Nino and la Nina cycle that suggests the past 40 years has been a warm trend for Southeast Alaska and severe winters may be likely to occur back to back in the future. Many of the deer wintering areas (which are all old growth stands of timber) in this area of Prince of Wales Island, are scheduled for harvest if the Forest Service prevails with current plans. The likelihood of a number of severe winters causing further deer population decline that affects the diminished wolf population must be considered (Person and Brinkman 2013).

To date neither of the State or Federal bureaucracies has interacted in manner that would effectively consider declining wolf populations —until it has reached this apparent crash in the population of wolves. It is my opinion that there is no better referee to this situation than the Endangered Species Act.

It appears simple to me (however, I know it is never simple), and I am not a biologist. If your Agency determines that the Alexander Archipelago wolf warrants listing under ESA, I believe everyone will then have to endeavor to persevere to become honest brokers. Timber management will have side-boards with a threshold, rather than a conjecture on the amount of viable deer winter range available for harvest; the Forest Service will then engage in planning that has a more reasonable chance of succeeding in the inevitable battle they face in the courts with every timber sale on Prince of Wales Island against their environmentalist foes. Because I did Land and Resource Timber management in both Alaska and Oregon for 15 years I know that having legally mandated thresholds alleviates planning efforts from relying on conjecture, when management always has a mandate for the largest and most economically efficient method of timber harvests and often despite common sense. This is not a disengagement of current management on the Tongass, it is simply a human condition known as the ‘tragedy of the commons,’ that comes into play whether they may be a Federal Timber Manager or a resident relying on subsistence deer hunting for a significant part of your winter’s larder, or if you are on the Board of game intent on keeping wolf populations under control in areas where they affect subsistence moose hunting. On Prince of Wales Island there are a finite number of deer, wolves and timber. Our laws do and should provide for relief from notions that result in cross purposes such as described above. Sustainability of natural resources, real sustainability should prevail over the notion of sustainability as a shell game for an economic interest in the

State of Washington—more intent on exporting timber for maximum profit than providing local jobs on Prince of Wales Island, Alaska.

If a listing is warranted, the Alaska State Board of Game may have to differentiate in trapping methods between north and south and for a time, harvest of wolves may cease in most of Unit 2 in Southeast Alaska for a time.

Residents will be prohibited from their misguided wanton taking of wolves and discarding their pelts. All agencies and the public on Prince of Wales Island, Alaska are completely capable of making decisions that may keep the Alexander Archipelago wolf from going extinct. Should this listing occur the sky will not fall.

I now live on the Sacramento River in Northern California. It was a mere two decades ago that American Bald Eagle was very rarely seen here, though they are plentiful of course in Alaska. Now I see a pair every month.

The Endangered Species Act is an important law responsible for our national symbols comeback. Your Agency is the most capable agency in the U.S. for sifting through the data and making hard decisions that are the right decision for the living national resources of our nation.

I comment only as a generalist to express my desire to see residents of Prince of Wales Island, Alaska; and the U.S., Forest Service and the Alaska Department of Natural Resources, all of which I hold in high regard, but they should, one and all commit to a common goal for the viable population of the Alexander Archipelago wolf and other indigenous species of southeast Alaska. I lived on Prince of Wales Island for almost a decade and raised my youngest son there, and consider the area with its diverse natural resources on public land and the people that hunt and fish this area as gems of our nation.

Whatever decision—I trust implicitly, that it will be neither one that has been derived arbitrarily nor derived in any capricious manner, but rather, one based on science and the available facts.

Sincerely,

James R. Kelly

USFS retired

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(former NEPA Team leader at Thorne Bay Ranger District 2007-2012/ former City Councilman and Vice Mayor of Thorne Bay, Alaska 2005-2012)

Person, D. K., and T. J. Brinkman, "Succession Debt and Roads: Short- and Long-Term Effects of Timber Harvest on a Large-Mammal Predator-Prey Community in Southeast Alaska." In *North Pacific Temperate Rainforests*, edited by G. H. Orians, and J. W. Schoen. Seattle, WA: University of Washington Press (Person and Brinkman 2013)