

- **Cascadia Wildlands • Greenpeace • Center for Biological Diversity •**
- **Greater SE Alaska Cons. Community • The Boat Company •**
- **Alaska Wildlife Alliance •**

July 23, 2015

Sam Cotten, Commissioner
Alaska Dept. of Fish & Game
1255 W. 8th Street
Juneau, Ak 99811-5526
sam.cotten@alaska.gov

Subj: Request for an Emergency Order to preemptively close the 2015-2016 hunting & trapping season for wolves in GMU-2

Dear Commissioner Cotten;

The undersigned organizations request you to issue an emergency order to preemptively close the 2015-2016 subsistence hunting and trapping season for wolves in Game Management Unit 2 (GMU-2).

All indications are that the GMU-2 wolf population has been severely depleted to a very low number, and has a heightened risk of extirpation. The current GMU-2 estimate, issued by ADF&G in June 2015 is that the fall 2014 population was only 89 wolves in GMU-2, within a range of 50 to 159.¹ However, that estimate is for before the 2014-2015 hunting and trapping season was conducted, in which 29 wolves were reported harvested and to which any illegal take (likely significant) was additional. The GMU-2 population is geographically and genetically isolated, and our concern apart from the direct risk of losing the population is the likelihood of creating a genetic bottleneck that would pose a longer term threat. As you are aware, the USFWS has found that listing the Alexander Archipelago wolf under the Endangered Species Act “may be warranted,” the agency is in the midst of a status review, and GMU-2 wolves are a special concern.

We are also making a contemporaneous request to the Federal Subsistence Board for emergency and temporary special actions to close the subsistence hunting and trapping season for GMU-2 wolves.

With the federal season slated to begin in six weeks and with coordination between the state and federal agencies being the best management approach, we ask that you decide our request without delay. Please inform us of your intent.

¹ This is a 95% confidence interval.

Sincerely,
(Verifiable signatures upon request)

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