

American Society of Mammalogists

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1 November 2015

Dr. Kimberley Titus
Chief Wildlife Scientist
Department of Fish and Game
Division of Wildlife Conservation
1255 W. 8th Street
Juneau, AK 99811

Dear Dr. Titus:

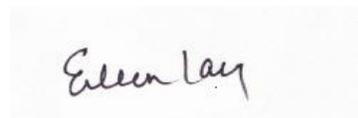
Thank you for your letter of 22 October 2015, written in response to the American Society of Mammalogists's (ASM) letter of 7 July 2015, in which ASM urged the closure of the gray wolf hunting and trapping season in GMU2 in the area including Prince of Wales Island.

ASM remains very concerned about the viability of this distinctive population of insular wolves, which has declined dramatically over the last decade and in particular during the past year. This population harbors substantial unique genetic variation and also represents a significant portion of the range of the morphologically distinctive subspecies *Canis lupus ligoni*. Due to the dramatic decline in the population, ASM urges ADF&G to do what is necessary to conserve this population, which is threatened by legal and illegal trapping harvest, habitat modification, and perhaps other potential issues (e.g., introduction of novel pathogens by pets). These extenuating circumstances argue for adopting a precautionary approach of "no further harm," specifically no more intentional human-caused mortality.

In an internal memorandum of 16 June 2015, Gretchen Roffler from your department states "This level of harvest [calculated at 26%] does not account for the magnitude of the predicted estimated decline at the GMU level." Given that your biologists could not predict the recent sharp, one-year decline in this population suggests that it is not possible to predict with any confidence that the targeted harvest mortality for this year will be sustainable by a population that is already in dangerous decline.

We understand that your mandate includes consideration of “social and legal” factors, but we argue that the biological imperative of this situation supersedes all other considerations. The social and legal questions will be moot if this population suffers extirpation in the short term or serious genetic deterioration that threatens its viability in the longer term.

Sincerely,

A handwritten signature in cursive script that reads "Eileen Lacey". The signature is written in dark ink on a light-colored background.

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