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Predation by wolves is not the most significant reason for the decline in the Sitka Black-tailed Deer population, as the ADF&G's own studies admit. There are many other factors contributing to the decline, particularly:

- Loss of habitat because of clear-cut logging, especially of old-growth forests. This causes a decline in the wolf population as well as in the deer population.
- Severe winter weather, especially three recent deep-snow winters. In fact, the Unit 1A Feasibility Study states "severe winter weather is believed to have the greatest impact on Unit 1A deer populations, often resulting in high rates of mortality."- ADF&G does not know the impact of black bear predation on deer fawns, but it cites data from a neighboring area indicating that black bears kill a significant number of fawns. The Feasibility Studies state that black bears have not (yet) been targeted for predator control in Southeast because of their economic value; nevertheless, if the BOG gets a foothold with predator control on wolvesin the area, bears would likely be the next target. Given this and many other unknown variables, predator control is not justified for either wolves or black bears. ADF&G also clearly states that these two "experimental" programs could be used as models for more Alexander Archipelago wolf control programs in Southeast Alaska.

The Unit 1A study stated that "we have no research information to accurately estimate wolf...numbers on Gravina Island." The Unit 3 study stated that wolf population counts are not even feasible there. ADF&G is equally unsure how many black bears are in either Unit, and it does not even know how many deer there are. The science is clearly lacking to support any predator control measures.

<u>I strongly oppose this unscientific, expensive wolf killing "experiment" on the rare Alexander</u>
Archipelago wolves!

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