25 November 2008

Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Dr., Suite 222
Arlington, VA 22203

RE: Proposed rule designating the Northern Rocky Mountain population of Gray Wolf as a distinct population segment and removing this distinct population segment from the federal list of endangered and threatened wildlife [50 CFR Part 17; RIN 1018-AW37; Fed. Reg. 73(209):63926-63932]

Dear U.S. Fish and Wildlife Service:

The American Society of Mammalogists (ASM) is a non-profit, professional scientific and educational society consisting of nearly 4,000 academic, government and private biologists from all 50 states and more than 60 other countries worldwide. ASM is devoted to the study and conservation of wild, native mammals, and advocates management based on sound science.

The following comments are being submitted for the public record in response to your 28 October 2008 proposed rule to designate as a distinct population segment (DPS) and subsequently delist the Northern Rocky Mountain (NRM) Gray Wolf (*Canis lupus*). After careful review of this most recent proposed rule, which was based on the previous proposed rule of 8 February 2007, we strongly oppose the proposal by the U.S. Fish and Wildlife Service (USFWS) to delist the NRM population of Gray Wolf and remove it from the federal list of endangered and threatened species under the Endangered Species Act of 1973. Despite significant steps taken toward recovery of Gray Wolf populations - and we thank USFWS for their efforts in this regard - the NRM Gray Wolf still faces serious threats to long-term persistence based on the inconsistencies present within state management plans, the proposed reduction of wolf population sizes to unsustainable levels, the possibility that even these minimal population levels could not be verifiably maintained once federal funding is removed, the small size of the DPS, the lack of connectivity (i.e., gene flow) among subpopulations within the NRM metapopulation.

We find major inconsistencies between federal and state management plans that are likely to result in confusion among landowners, the general public, and government agencies, particularly when managing for Gray Wolves in areas where breeding populations do not currently exist. An example is ambiguity regarding the authority to manage wolves in Oregon outside of the proposed DPS boundary (but within Oregon; as voiced by Oregon Department of Fish and Wildlife to USFWS in public testimony 7 March 2007, Pendleton, Oregon). Delisting in Idaho and Montana before Wyoming could result in confused and insufficient management of this barely recovered species including an inability to manage individual wolf packs whose home ranges transcend state and national park boundaries.

Although the current NRM Gray Wolf population has reached and surpassed the initial recovery goals, we believe that a better plan for long-term recovery of Gray Wolves in the region would be to establish a minimum metapopulation size in winter of 3,000 wolves within the dispersal range of currently thriving populations (i.e., the true DPS, not that defined by state management-area boundaries). Until this target is reached, it is unlikely that the NRM metapopulation will have a sustainable *minimum* number of ***breeding*** animals of 500 (based on minimal requirements for mate finding, pack formation, and maintenance of genetic variation; Franklin 1980, Gilpin and Soulé 1986, Soulé 1987).

We see the recent Minnesota Gray Wolf population history as a parallel to the NRM Gray Wolf. More than 30 years of protection under the federal ESA allowed the initial population of 350 wolves in Minnesota to increase and disperse to Michigan and Wisconsin, re-establishing sustainable populations in the latter two states, and reaching a current regional population of over 3,000 wolves. Allowing time for natural dispersal to re-establish breeding populations of NRM Gray Wolves in portions of Oregon and, perhaps, Utah and Colorado, as well as a broader distribution in Wyoming and Montana, would enhance natural gene flow and increase the likelihood of long-term recovery of the DPS.

Delisting under the proposed plan and recovery goals would trigger a culling by the states of the majority of the existing 1,400 wolves and could result in a minimum metapopulation of 450 wolves outside of the national parks. This would not be a sufficient population size to allow re-colonization of areas within the DPS boundary that are currently unoccupied by breeding pairs, nor would it be sufficient to ensure adequate long-term maintenance of genetic diversity, especially given that the NRM metapopulation is more isolated from Canadian populations than is the Western Great Lakes metapopulation. It is much preferred that genetic diversity be maintained by natural dispersal rather than human-aided translocations, as translocations are expensive and problematic. Further, the proposed large reduction in numbers would reduce the population by nearly 70% and thus should be viewed as a severe population bottleneck. A bottleneck of this level should be expected to trigger many detrimental effects, not only loss of genetic diversity, but also increases in levels of inbreeding and loss of locally adapted genotypes.

We see no compelling argument that the states at this time need to be able to kill additional wolves beyond those causing depredation problems (which they can do and are continuing to do under the Experimental Population designation). Many of the additional wolves that would be culled under the delisting proposal and existing state management plans would be dispersing individuals; killing them will make pack re-establishment, new pack establishment, and expansion into currently unoccupied areas of the DPS far less likely to occur.

In addition, for states to manage at a “minimum population size” requires intensive and continuous population monitoring throughout the state. However, the Idaho state plan, for example, reads that if federal funding for wolf management is eliminated, the state will not fund efforts to eliminate or control wolf-related conflict (ILWOC 2002:23). This is highly problematic because funding for continued wolf management in Idaho is not ensured and would end the moment federal agencies discontinue the flow of these funds to Idaho. This leads us to question whether monitoring will be sufficient to maintain recovery objectives, because management objectives and protocol remain unclear and inconsistent. We have similar misgivings about the shortcomings of Wyoming's management plan. There must be firm assurances that this monitoring will be fully funded, and with the ongoing federal budgetary exigencies, this critical monitoring more than likely will be thrust upon each of the states involved, one of which (Wyoming) continues on without a USFWS approved wolf state management plan. Section 4 of the ESA is clear about the importance of post-delisting monitoring in the overall scheme of delisting, and the present delisting proposal fails to adequately address this critical issue.

Another reason we are urging adoption of new, higher recovery goals and recovery over a larger area within the potential DPS relates to the many unanticipated ecosystem benefits accruing from the trophic cascade triggered by successful re-establishment of the top predator in otherwise protected Northern Rocky Mountains ecosystems. This ecosystem restoration effect has been well documented in Yellowstone NP and includes, for example, restoration of

riparian and beaver-pond habitats and communities (Ripple and Beschta 2003). Such effects require a sustainable and functional predator population and will not be realized over a broad area by the likely small population sizes under the current recovery levels. We believe that predator population "ecosystem effects" must be considered within the definition of recovery levels, and moreover, that ecosystem restoration was part of Congress's original intent in passing the ESA.

In summary, we stress that considerable resources have been dedicated to NRM Gray Wolf recovery over the past two decades, and ecosystem integrity in the Northern Rocky Mountains has begun to benefit from this recovery. If the Gray Wolf is removed from federal protection under the current minimal recovery goals, this remarkable ecological recovery will cease. In that case, we will have recovered a small, genetically impoverished, and likely unsustainable wolf population existing within only a fraction of the species' former range. This is not biological recovery, nor is it recovery as defined under the Endangered Species Act of 1973.

We thank you for the opportunity to provide comments on this very important issue, and would be happy to provide additional information or assistance on this topic as needed.

Respectfully submitted,

Suzanne B. McLaren, President
American Society of Mammalogists

Literature Cited

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