



Wisconsin's Green Fire Comments to the U.S Fish and Wildlife Service on Proposal to Remove the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife, Federal Register 84 (51):9648-9687 (Docket No. FWS-HQ-ES-2018-0097)

May 30, 2019

Introduction

Thank you for the opportunity to offer comments on the draft gray wolf delisting rule. Wisconsin's Green Fire is a nonpartisan and independent group of experts in natural resource management, environmental law and policy, scientific research, and education that are dedicated to use of science-based management of Wisconsin's natural resources. Our Wildlife Work Group members have extensive experience in the conservation of the gray wolf and are very interested in the future conservation of this species. We want to express our thanks to the U.S. Fish and Wildlife Service (USFWS) for producing this draft of the proposed rule. We recognize that the USFWS has a long and extensive record of promoting the recovery of gray wolves in the region since 1974, and has worked closely with the Wisconsin Department of Natural Resources, other state wildlife agencies, the U.S. Department of Agriculture (USDA) - Wildlife Services and Native American Tribes in the region.

Summary

The following comments support the position of Wisconsin's Green Fire (WGF) that the gray wolf should be removed from the federal list of endangered and threatened wildlife in the western and central states of the contiguous U.S. We believe that populations of wolves in these states meet the criteria for delisting, and that returning management to state, tribal and federal natural resources agencies would be in the best interests of the species and public. Delisting would provide land management agencies with flexibility in managing wolf populations at sustainable levels while reducing the wolf/human conflicts which drive social carrying capacity and public acceptance of wolves on the landscape. These comments apply to gray wolves across the central and western states. Mexican gray wolf populations (*Canis lupus baileyi*) in the Southwest and red wolves (*Canis rufus*) in the Southeast continued to be highly endangered in the U.S. Eastern wolves (*Canis lycaon*), now recognized as threatened by the Canadian government and province of Ontario, are a highly threatened species and should be protected if any disperse into the northeastern U.S. These comments by Wisconsin's Green Fire are specific to federal gray wolf delisting, and do not reflect on the specifics of state management in Wisconsin. We believe the latest Wisconsin state wolf plan and harvest regulations will not likely cause wolves to decline to levels requiring relisting at federal or state levels anytime in the foreseeable future, but we also believe the state wolf harvest regulations need to be revised to be a more inclusive and science-based process.

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Wisconsin's Green Fire supports the federal delisting of wolves for the following reasons:

- The gray wolf population in the Great Lakes region has grown from 400-500 in the 1960s (all in Minnesota), to a regional total in 2018 of at least 4,222 wolves spread across Minnesota (2,655), Wisconsin (905), and Michigan (662). The Minnesota wolf population estimates peaked at 3,020 wolves in 2004, and have since fluctuated between 2,211 and 2,911 wolves. Michigan wolf estimates peaked at 687 in 2011, and have since fluctuated between 618 to 662 wolves. Thus it appears these wolf populations may be somewhat stabilized. Wisconsin's wolf count peaked at 925 wolves in 2017, declined slightly to 905 wolves in 2018, and may also be starting to stabilize.
- Gray wolves have successfully occupied most available habitat across the western Great Lakes region and little additional habitat for wolf colonization exists within the region¹. Only one habitat suitability model suggests there might be some suitable gray wolf range in the western Plains States. However, this model did not incorporate forest cover, which when added would make the area unsuitable for gray wolves². It can be stated that gray wolves have largely occupied all of the suitable habitat in the central U.S.
- Additional suitable wolf habitat exists in the western U.S. The delisted wolf population in the northern Rocky Mountains continues to serve as an important source of wolves for the region. Under state management, dispersing wolves will continue to spread out through the region. The gray wolf population expanded into Oregon, Washington and recently California, and probably will eventually expand into most large areas of suitable habitat in the region.
- The northeastern U.S. has no breeding wolf population, and is not likely to be impacted by gray wolf delisting in the central and western U.S. Any re-colonization into the eastern U.S. will depend on dispersal from Canada. (It should be noted that there is still considerable disagreement whether gray wolves originally inhabited the eastern U.S.³).
- Humans continue to be the most important mortality factor for wolves in the Great Lakes region as well as in most areas of gray wolf range in North America. Annual survival rates for wolves in Wisconsin (76%⁴) and Michigan (75%⁵) were similar to those in the northern Rocky Mountains (75%⁶). In core wolf habitat in Wisconsin, wolf survival rates are similar to the highly protected wolf population in Yellowstone National Park, both having annual survival rates of about 80%^{4,7}. During early years of recolonization in Wisconsin, survival rates were less than 65%. At that time, human-caused mortality caused population declines or very slow population growth, but management actions have reduced human-caused mortality to allow healthy growth of the wolf population⁴.
- The Great Lakes wolf population was previously delisted during parts of 2007-2008, for two months in 2009, and in 2012 through 2014. During these periods of state management, population monitoring documented no major decline in wolf numbers. Research in Wisconsin demonstrated that rates of illegal killing declined during periods when the State had management authority⁸.
- State and Federal agencies in Minnesota, Michigan and Wisconsin have been involved in intense wolf monitoring since federal listing. The states have used this information to manage wolf

populations when wolves were delisted. During the delisting in 2012, Minnesota saw a possible decline in wolf numbers; thus in 2013 the Minnesota Department of Natural Resources reduced the harvest quotas, resulting in a 10% increase in wolf numbers the next year. The 2013 Wisconsin wolf harvest resulted in an 18% decline in wolf numbers, and in 2014 Wisconsin Department of Natural Resources (WDNR) reduced quotas resulting in a 13 % increase in wolf numbers. These examples demonstrate state agency abilities to manage wolf harvest quotas, and maintain wolf numbers at healthy population levels.

- Depredations by wolves on domestic animals increased during periods without lethal control authority in Wisconsin and Michigan. In Wisconsin, the number of cattle depredations, number of farms reporting depredations, and pet dogs attacked near homes, peaked in 2010 and 2011. At the start of delisting in 2012, the state wolf count was 815. After 3 years of public harvest and lethal control of depredating wolves by USDA-Wildlife Services, the population declined to 746 in 2015 (8.5% reduction). During that same time period verified wolf kills on cattle declined from 71 in 2011 to 30 in 2014 (57% reduction), and numbers of farms with wolf depredations declined from 40 in 2011 to 22 in 2014 (45% reduction) (USDA-WS reports). Thus through active management the State was able to drastically reduce depredations without causing a major decline in the wolf population.
- State wolf management plans and the recent history of wolf management in the Great Lakes region show that states will continue to apply sound conservation to managing gray wolves. Only Wisconsin has attempted some modest reductions in wolf numbers to reduce conflict and improve public acceptance of wolves. Minnesota and Michigan are allowing wolf populations to fluctuate naturally or use wolf harvest to stabilize population growth. All three states are committed to maintaining healthy wolf populations.
- The wolf harvest regulations put in place by the Wisconsin Legislature in 2012 was more aggressive than necessary in several respects, resulting in higher levels of public and tribal opposition and user conflicts than surrounding states have experienced. While these concerns continue, the wildlife managers of the WDNR have demonstrated they could create harvest zones, manage a system to harvest wolves at quota levels, and ultimately maintain healthy wolf numbers.
- Wolves play important roles in the culture of many Native Americans. In the Great Lakes region, the Ojibwe Tribes view the wolf, *Mai'ingan*, as a brother and often have different wolf population objectives from the states. Federal delisting and post delisting actions need to recognize and support tribal perspectives on wolf conservation.
- When delisted, wolf management will be returned to the states and tribes. Because tribal authority is restricted to tribal lands, state management could negatively affect wolf management by tribes. The USFWS as trustee of tribal authority to manage wolves and other wildlife on tribal lands, must assure that tribes are directly involved in management when wolf home ranges include tribal lands.
- Gray wolf populations across the Pacific Coast, northern Rocky Mountains, and Great Lakes region are doing very well. There are over 6,000 wolves living across the northern U.S. and they are directly connected to another 50,000-60,000 wolves in Canada. Wisconsin's Green Fire (WGF) believes that these wolf populations no longer need to be managed as a federal

endangered species. All states with breeding wolf populations have demonstrated a commitment to sound conservation of the wolf population. WGF believes that delisting the gray wolf will provide agencies with management tools necessary to decrease wolf-human conflicts and increase public acceptance of wolves.

For more information on these comments please contact
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Foot Notes:

¹Mladenoff et al. 2009. Change in occupied wolf habitat in the northern Great Lakes region. Pp. 119-138 in A.P. Wydeven, T. R. Van Deelen, and E.J. Heske, eds. *Recovery of Wolves in the Great Lakes Region of the United States: An Endangered Species Success Story*. Springer, New York, NY, USA. 350 pp.

²Smith et al. 2016. Suitable habitat for colonizing large carnivores in the Midwestern USA. *Oryx* 50:555-564.

³ Nowak, R.M. 2003. Wolf evolution and taxonomy. Pp. 239-258 in L.D. Mech and L. Boitani, eds, *Wolves: Behavior, Ecology, and Conservation*. U. Chicago Press, Chicago, IL

⁴Stenglein et al. 2018. Compensatory mortality in a recovering top carnivore: wolves in Wisconsin, USA (1979-2013). *Oecologia* 187:99-111

⁵O'Neal et al. 2017. Spatially varying density dependence drives a shifting mosaic of survival in a recovering apex predator (*Canis lupus*). *Ecology and Evolution* 7:9518-9530

⁶ Smith et al. 2010. Survival of colonizing wolves in the northern Rocky Mountains of the United States, 1982-2004. *J. Wildl. Manage.* 74: 620-634.

⁷ Cubaynes et al. 2014. Density-dependent intraspecific aggression regulates survival in northern Yellowstone wolves (*Canis lupus*). *J. of Anim. Ecol.* 83: 1344-1356.

⁸ Olson et al. 2015. Pendulum swings in wolf management led to conflict, illegal kills, and legislated wolf hunt. *Conservation Letters* 8:351-360.