



National Headquarters

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Via Federal eRulemaking Portal

Docket No. FWS-R3-ES-2011-0029

Public Comments Processing

Attn: FWS-R3-ES-2011-0029

Division of Policy and Directives Management

U.S. Fish and Wildlife Service

4401 N. Fairfax Drive, MS 2042-PDM

Arlington, VA 22203

RE: Comments on Proposed Rule To Establish and Delist the Western Great Lakes Distinct Population Segment of the Gray Wolf, 76 Fed. Reg. 26086 (May 5, 2011)

To whom it may concern:

Defenders of Wildlife (Defenders) submits the following comments in response to the U.S. Fish and Wildlife Service's (Service) May 5, 2011 Federal Register notice requesting public comment on the proposed rule to revise the listing of the gray wolf in the eastern United States and to initiate status reviews for the gray wolf and the eastern wolf under the Endangered Species Act (ESA). These comments respond only to the request for information concerning the proposed rule to establish and delist the Western Great Lakes Distinct Population Segment (DPS) of the gray wolf. Comments on the other actions in the Federal Register notice will be subsequently submitted. We urge the Service to address these other actions in rulemakings separate from the proposed rule concerning the Western Great Lakes DPS. As explained below, Defenders believes that the establishment and delisting of the DPS is warranted at this time.

Defenders supports the Service's proposal to revise the current listing of the Minnesota population of gray wolves and to establish it as a Western Great Lakes DPS. The best available science does not support the continued listing of the Minnesota population as a distinct entity because the population has significant demographic and genetic connections to wolves in Wisconsin and Michigan. We thus agree with the Service that the boundaries of the Minnesota population should be revised under the Service's current Distinct Population Segment Policy (61 Fed. Reg. 4725, Feb. 7, 1996). We also agree with the Service's revised boundaries for the Western Great Lakes DPS based on the physical separation of the DPS from other gray wolf

populations in the United States and the international border with Canada. In our view, the DPS satisfies the discreteness and significance criteria required for establishing a DPS.

Defenders further supports delisting of the DPS because: (1) the best available science indicates that it has exceeded appropriate scientifically-based recovery goals, (2) the state management plans and regulations are adequate to maintain recovered wolf population levels, and (3) the post-delisting monitoring plan, if properly implemented, is sufficient to monitor the status of wolves and the adequacy of state management activities. We agree that the wolf population in Minnesota, Wisconsin, and Michigan has recovered to the levels necessary to delist. The population far exceeds the scientifically-defensible recovery goals in each state's wolf management plan and is able to mix freely with the wolf population in nearby Canada. Equally important is that the current total population levels and the levels likely to be maintained under the current state management plans reflect a scientifically-credible and statistically-robust estimate for a minimum viable population of wolves. We believe that with continued conservation, the thousands of wolves now roaming the boundaries of the proposed DPS will continue to persist well into the future.

We agree that each state plan is generally adequate to maintain the recovered status of wolves post-delisting. The Wisconsin plan deserves particular acclaim because it establishes a generous population target relative to the size of the state and incorporates good monitoring protocols. Likewise, the Michigan plan adopts an incremental approach to wolf control in order to minimize human-wolf conflicts that will likely result in less frequent lethal control and explicitly encourages public awareness of wolves.

Despite these strengths, all three state management plans could be improved upon. For example, the Minnesota plan, which has not been updated since 2001, adopts an *ad hoc* approach to monitoring wolf populations and requires few efforts to resolve human-wolf conflicts incrementally. Wolves in Minnesota Management Zone B (which largely covers portions of the state in which wolves do not currently occur) may be killed at any time on private property to protect livestock. Nonetheless, we believe these deficiencies are not serious enough to prevent the state plans from maintaining the long-term viability of the western Great Lakes wolf population. This is because each state appears willing and capable of overcoming these challenges by regulating human take of wolves, maintaining a sufficient prey base for them, and protecting their denning and rendezvous sites. In particular, we see no evidence leading us to believe that unrestricted lethal control in a portion of Minnesota that is largely unoccupied by wolves threatens their recovery, which depends on maintaining a sufficient number of wolves elsewhere in the state where lethal control is far more restricted. We look forward to carefully reviewing the Service's annual evaluation of the implementation and outcomes of these state management plans, as established in the Service's final post-delisting monitoring plan for the DPS.

The Endangered Species Act is only one aspect of the system of managing America's wildlife diversity. We urge the Service to work with the states, particularly Minnesota, to stress public education about wolves and to support the implementation of proactive measures to reduce wolf-livestock conflicts. We also encourage the Service to help the states in any efforts they may undertake to maintain ecologically functional population levels of wolves. Populations of highly-interactive species such as the gray wolf are important in the maintenance of other plant and wildlife diversity in ecosystems. Continued growth of the Great Lakes wolf population will have significant ecosystem benefits and should be encouraged.

Thank you for the opportunity to comment on the Service's proposed rule. If you have any questions about our comments, please contact Ya-Wei Li at yli@defenders.org or 202-682-9400.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Rappaport Clark". The signature is stylized and cursive, with the first name "Jamie" being the most prominent.

Jamie Rappaport Clark
Executive Vice President