

December 17, 2013

Public Comments Processing
Attn: FWS-HQ-ES-2013-0073
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, MS 2042-PDM
Arlington VA 22203

The Wildlife Society appreciates the opportunity to submit comment on the U.S. Fish and Wildlife Service's proposal to remove the gray wolf (*Canis lupus*) from the list of endangered species and to maintain protection for the Mexican wolf (*Canis lupus baileyi*) by listing it as endangered.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of nearly 11,000 professional wildlife biologists and managers dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and associated habitats worldwide.

Proposed Delisting of Gray Wolf

Overall, The Wildlife Society supports removing the current listing for the gray wolf (*Canis lupus*) and maintaining protections for the Mexican wolf (*Canis lupus baileyi*). Given that the ESA does not require the USFWS “to restore the gray wolf to all of its historical range or even to a majority of current suitable habitat” but does require that they “recover listed species such that they no longer meet the definitions of ‘threatened species’ or ‘endangered species’” this proposed rule provides a solid case to delist 2 subspecies that occur within the contiguous U.S. (*C. l. nubilus/occidentalis*), while continuing ESA protection for the Mexican gray wolf subspecies (*C. l. baileyi*) wherever it occurs. TWS agrees that from a practical standpoint this proposal will allow the USFWS to refocus limited resources on promoting recovery of the Mexican wolf, as well as other critically endangered species, rather than continuing to invest in a broader recovery of gray wolves will be clearly the responsibility of the States.

However, we are concerned about the effect of this proposal on the conservation of both eastern (*C. lycaon*) and red wolves (*C. rufus*). Until now, the geographically broad classification of gray wolves has provided protection for the red wolf and the eastern wolf. By lifting ESA protection on *C. lupus* through the current proposal, USFWS is reducing the geographic scope of protection for the red wolf and leaving the eastern wolf unprotected. Aside from harming the conservation of these two species, in taking this action the USFWS is not meeting the stated goal of their own National Wolf Strategy.

The red wolf is clearly endangered. Therefore it would be appropriate to list all areas of suspected original range of red wolves /eastern wolves as areas where red wolves are considered endangered: areas of eastern Texas, eastern Oklahoma, southern Missouri, Arkansas, Louisiana, and all states east of the Mississippi River outside the recovered Western Great Lakes gray wolf

population (using a combination of red wolf and eastern wolf range as displayed by Nowak (2003) to designate historical range). Upon the removal of endangered species designation for gray wolves in the area, red wolves should receive immediate protection, so that any wolf (*C. lycaon* or *C. rufus*, but not *C. latrans*) that might occur in the area would receive federal protection. If at some future date it is determined that *C. lycaon* is a separate species but is not endangered, than those areas considered part of the original eastern wolf range could be delisted. If the red wolf population recovers to point of no longer needing federal protection, the remainder of the eastern U.S. could be delisted.

We also have some concern regarding the taxonomic decision to recognize the eastern wolf as a different species (*C. lycaon*) rather than a subspecies (*C. l. lycaon*). Since there is currently substantial debate on this aspect of wolf taxonomy, it seems premature for USFWS to remove protection from a taxon that may ultimately be determined to require that protection under the ESA. Logically, either *C. l. lycaon* should be evaluated as a subspecies under this proposal, or the removal of *C. lupus* in the eastern U.S. from ESA protection should occur in synchrony with a thorough status review of *C. lycaon* and an associated proposal to list them or not.

Because of the confusing and debated taxonomy of wolves in the U.S., delisting and reclassification should be done with all wolf taxon being considered together. As stated in the Federal Register under the “National Wolf Strategy” on p. 35667, the Act should “(2) ensure that actions taken for one wolf population do not cause unintended consequences for other populations.” Removing gray wolf protection without providing protection for red and eastern wolves may cause such unintended consequences.

Mexican Gray Wolf Listing

The Wildlife Society supports the proposal to list the Mexican wolf subspecies as endangered. However, we are concerned that the proposal might be too quick to dismiss the potential impacts of climate change, as the climate change section for the Mexican wolf is weak. The subspecies in the area of the U.S. is expected to see the greatest rise in temperature. Thus the firm conclusion that climate change will not significantly affect *C. l. baileyi* in the future seems unwarranted, as we cannot accurately predict the effects.

Other Suggestions

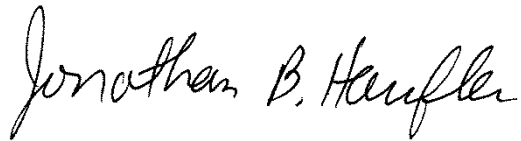
- A map of North America showing subspecies ranges, as recognized in the document, is sorely needed. The reader cannot be expected to follow the taxonomic discussions without a visual aid. The map that shows the current legal status under the ESA should be referenced more throughout the document.
- Page 35670, middle of 3rd column. The “Brewster and Fritts 1995” citation should be added after the sentence that reads as “As stated above, gray wolf taxonomy at the subspecific level has long been debated with evolving views on the validity of various subspecies.”
- Related to the comment above, page 35668, 3rd column, is the statement that “A recent genetic study found that gray wolves also occur in portions of North Africa (Citations).”

The statement should say “...the study suggested that gray wolves also occur in North Africa” or “...the study provided mitochondrial DNA evidence that gray wolves also occur in North Africa.” Note that on page 35678, 1st column, under *Historical Global Distribution*, the authors do use the word “suggests” in this context.

- Page 35716, 1st column, end of 1st full paragraph: The statement, “Wolf populations in North America have historically weathered large contractions in their geographic ranges without obvious adverse effects to the populations in other areas,” need to be followed by a literature citation.

Thank you for considering the views of wildlife professionals. Should you have any questions, please do not hesitate to contact Laura Bies, Director of Government Affairs (301.897.977 x308; laura@wildlife.org).

Sincerely,

A handwritten signature in black ink that reads "Jonathan B. Haufler". The signature is written in a cursive, flowing style.

Jonathan B. Haufler, Ph.D., CWB
President