

Date: April 10, 2019

To: U.S. Fish and Wildlife Service

Re: Docket No. FWS-HQ-ES-2018-0098-00001

The San Francisco Bay Area Chapter of The Wildlife Society (SFBay TWS) represents 250 professional wildlife biologists and managers in the greater Bay Area of California. TWS is an international non-profit scientific and educational association. Our mission is to ensure that wildlife and habitats are conserved through management actions that take into careful consideration relevant scientific information. SFBay TWS opposes the proposed Endangered Species Act (ESA) generic delisting of gray wolves in the lower 48 states, with the exception of the Mexican gray sub-species. This potential delisting overlooks the ESA's goal of protecting wildlife species for population growth and expansion until they are not likely to be jeopardized in historical areas still available as wildlife habitat.

Wolves were exterminated from the lower 48 states, except in Minnesota, by the 1940s. It was only when the ESA was signed into law in 1973 that wolves received a second chance to return to their historical habitats. ESA protections are what permitted wolf populations to return to their historical habitats, i.e., the Northern Rocky Mountain (NRM) Distinct Population Segment (DPS) region and the Great Lakes DPS region. Protections provided by the ESA are what allowed these populations to survive, most notably the USFWS recovery goal requirement of 100 wolves with 10 breeding pairs for three consecutive years in each state, before wolves are delisted (U.S. District Court Case). Several of these states (Idaho, Montana, Wyoming, Minnesota, Wisconsin, and Michigan) did not manage wolf populations sustainably following delisting, and wolves were relisted until the states could prove sustainable management numbers.

A minimum of 100 wolves for a state is hardly a strong sustainable population, especially in large wilderness areas, and given that systematic errors occur in radio-tracked wolf population data such as unknown fates and illegal kills (Ogden). This is particularly true in the Northern Rocky Mountain region where there are over 26 million acres of public wilderness lands available in Idaho, Montana and Wyoming for wolves to roam in their historical habitat. If wolves are delisted and lose ESA protection measures, they are not likely to thrive in sustainable numbers, much less disperse into other states where historical lands are still available for future packs. Montana is allowing wolf numbers on the landscape to be counted by hunters. With Montana's strong hunter/rancher mentality adverse to wolves, there is no evidence that they are providing realistic data counts.

As top predators in the ecosystem, wolves control prey populations from growing beyond carrying capacity, helping to maintain balance and increase diversity at lower trophic levels (Estes et al., Callan et al). They are invaluable on the landscape. One example are elk in Yellowstone National Park. Following wolf extirpation in the 1920s, elk numbers had swelled to more than 19,000 by 1994, and they had decimated the grasses and river beds. Park

management recognized herbivory was altering vegetation and implemented elk culls to contain the population (Boyce). When wolves were reintroduced in 1995 after 70 years, elk populations declined to a now sustainable number of 7,579 (MT Fish Wildlife and Parks and Yellowstone Na. Park Biologists Jan 2019). Wolves provide an essential function for helping keep ecosystems in balance. Eliminating wolves and other predators from the ecosystem is “absolutely the wrong way to go. We’ve been there before in the 1900s, and they’re still recovering” (Kobilinsky).

Wolves in the Northern Rocky Mountain DPS and Great Lakes DPS have the advantage of gaining population numbers from Canada through dispersal (U.S. Dept. Justice). Other historical areas in the lower 48 where habitat remains but sustainable numbers of wolves have yet to disperse includes, among others, California, Colorado, North and South Dakota, Nevada, Utah, Ohio, Indiana, and Illinois.

California has only one wolf pack, the Lassen Pack. California and other states rely on dispersing wolves from the NRM DPS and Great Lakes DPS. For example, California almost completely depends on wolves dispersing from Oregon, a member state in the NRM DPS. If wolves are delisted, hunting will likely reduce the number of dispersers from Oregon, creating more open habitat spaces where there are currently wolves. The result will be that dispersing wolves will have open landscape in Oregon and won’t need to venture into California to find their own territories. This would severely limit wolf numbers in California, where dispersing wolves are needed for genetic diversity and healthy pack social systems.

Endangered species’ ability to disperse and move between populations is a metric that managers use to decide if protections are still required (Maletzke et al.). In areas of high wolf density, the dispersal period is longer with low success. In low wolf density areas with vacant territories, dispersal is a short process, resulting in population growth and increasing pack numbers (Blanco, Cortes). Wolves have refined social structures with prey abundance and available space determining pack size (Lopez). Expanding packs, with dispersers, supports pack stabilization (Tallents, et al). Taking away ESA protection measures in states where there is wolf habitat but no wolves or few wolves would destabilize any numbers they have and likely lead to decline. To maintain the forward momentum of wolf dispersal, ESA protection of wolves is essential. Generic removal of ESA protections for gray wolves on the lower 48 would negatively impact ecosystems, fledgling small wolf packs, and those dispersers seeking mates to begin packs. SFBay TWS urges the USFWS to keep gray wolves in the lower 48 on the Endangered Species List.

Sincerely,

San Francisco Bay Chapter of The Wildlife Society
Jeanne Wetzels Chinn, Chair, Conservation Affairs Committee

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