Wisconsin Chapter of The Wildlife Society Executive Board

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) by the Wisconsin Chapter of The Wildlife Society

May 11, 2019

Thank you for the opportunity to offer comments on the draft gray wolf delisting rule. Our membership has extensive experience in the conservation of the gray wolf and we are very interested in the future conservation of this species. We want to express our thanks to the US 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 Great Lakes region since 1974 and has worked closely with the Wisconsin Department of Natural Resources, other state wildlife agencies, the USDA- Wildlife Services, and Native American Tribes in the region. The Wisconsin Chapter of The Wildlife Society is an organization of 225 wildlife professionals dedicated to sustaining people, wildlife, and their habitats. We fully support the delisting of gray wolves as proposed for the following reasons:

- The population of gray wolves in the Great Lakes region has grown from 400-500 in Minnesota in the 1960s, to at least 4,222 spread across Minnesota (2,655 wolves) , Wisconsin (905 wolves) and Michigan (662) in 2018. Since the 1990s wolf populations in Minnesota have started to stabilize at 2,220 to 3,000 wolves and in the Upper Peninsula (UP) of Michigan at 620 to 680 wolves since 2011. The number of wolves in Wisconsin in 2018 was 905, down slightly from the 2017 count of 925 wolves, so perhaps the wolf population is starting to stabilize there as well.
- Gray wolves have successfully occupied most available habitat across the western Great Lakes region and little additional habitat for wolf colonization exists within the region[1]. 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 wolves[2]. 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 population of gray wolves 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 through the region. The population expanded into Oregon, Washington, and recently California, and likely will expand into most large areas of suitable habitat in the region over time.
- The Northeastern U.S. has no breeding population of gray wolves and likely will not be impacted by delisting the gray wolf in the Central and Western U.S. Any re-colonization into eastern U.S. will depend on dispersal from Canada. (It should be noted that there is still considerable disagreement whether gray wolves originally lived in the eastern U.S.[3]).
- Humans continue to be the most important mortality factor for wolves in the Great Lakes region as well 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 the Northern Rocky Mountains (75%[6]). In core wolf habitat in Wisconsin, wolf survival rates are similar to the highly protected population of wolves in Yellowstone National Park, both having annual survival rates of about 80%[4,7]. Human-caused mortality has been reduced considerably in recent years and is allowing for very healthy populations of wolves with high survival rates in the Great Lakes and Northern Rocky Mountains.

- The population of wolves in the Great Lakes region was previously delisted during parts of 2007-2008, 2009, and 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 authority[8].
- 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 their populations of wolves when delisted. During the delisting in 2012, Minnesota saw a possible decline in wolf numbers, so in 2013 they reduced 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 reduced quotas resulted in a 13 % increase in wolf numbers. These examples demonstrate the ability of state agencies 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 wolves. After 3 years of public harvest and lethal control of depredating wolves by USDA-Wildlife Services, the population of wolves declined to 746 in 2015 (a reduction of 8.5%). During that same period, verified wolf kills of cattle declined from 71 in 2011 to 30 in 2014 (a reduction of 57%) and numbers of farms with wolf depredations declined from 40 in 2011 to 22 in 2014 (a reduction of 45%) (USDA-WS reports). Thus through active management, Wisconsin was able to drastically reduce depredations without causing a major declined 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 states are committed to maintaining healthy wolf populations.
- In Wisconsin, the legislated state wolf harvest was perhaps more aggressive than necessary[8], creating concerns by members of the public and some Tribes. But the wildlife managers of the Wisconsin Department of Natural Resources demonstrated they could create harvest zones, a system to harvest wolves at quota levels, and maintain healthy wolf numbers.

- Populations of gray wolves across the Pacific Coast, Northern Rocky Mountains, and Great Lakes region are doing very well. Over 6,000 wolves are living across the northern U.S. and they are directly connected to another 50,000-60,000 wolves in Canada. 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. The Wisconsin Chapter of The Wildlife Society believes that delisting the gray wolf will provide agencies with management tools necessary to decrease wolf-human conflicts and increase public acceptance of wolves.

  (Our statements only apply to gray wolves across central and western U.S. We do feel Mexican gray wolves (*Canis lupus baileyi*) should continue to be an endangered species in the Southwest, red wolves (*Canis rufus*) continue to be highly endangered in the Southeast, and eastern wolves (*Canis lycaon*), now recognized as threatened by the Canadian government and the province of Ontario, are a highly threatened species and should be protected if any disperse into the northeastern US.)

Respectfully submitted by
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Foot Notes:

[1]Mladenoff 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.

[2]Smith 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

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

[5] O'Neal at 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.