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Wolf Comments  
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The Idaho Chapter of The Wildlife Society is a nonprofit scientific and educational organization of about 250 professionals active in wildlife research, management, education, and administration. We appreciate this opportunity to comment on the proposed change in classification of the gray wolf under the Endangered Species Act (ESA) and the proposal to establish special regulations for the gray wolf under section 4(d) of the ESA. We will limit our comments to the proposed Western Distinct Population Segment (DPS) of which Idaho is a part.

We support the proposed establishment of a Western DPS of gray wolves in the States of Montana, Wyoming, Colorado, Utah, Idaho, Washington, Oregon, and portions of northern Arizona and New Mexico, and the proposed reclassification of the gray wolf in the Western DPS from endangered to threatened under the ESA. However, we feel that the Service has not put forth any valid, scientific reason to exclude California and Nevada from the balance of the Western DPS, nor is there a scientifically justifiable reason to treat California or Nevada differently than the remainder of the Western DPS. Wolves dispersing from Idaho have the potential to establish in Oregon, and there is nothing to physically block continued dispersal into northern California. Likewise, wolves dispersing to southern Idaho could easily move into Nevada. The Service's proposed action would limit wolf recovery opportunities in California and Nevada. Wolves finding their way to these states would not be protected from human persecution under the proposed rule.

We support the special 4(d) rule that would be established in the Western DPS. Experience in northwestern Montana, central Idaho, and Yellowstone National Park (over the last 14 years for Montana and 5 years for Idaho and Yellowstone) has demonstrated that humans cause most of the mortality to wolves; that the principal determinant of successful recovery of wolves is human

attitudes; and that providing the ability to manage wolves increases acceptance on the part of those who have to coexist with wolves and ultimately fosters recovery. If our interpretation is correct, the only significant difference between the nonessential experimental population rules and the 4(d) rule proposed for the Western DPS, is that the latter would allow private landowners to take wolves in the act of attacking livestock or domestic animals on private lands. Control of depredating wolves and successful enforcement have succeeded in minimizing unauthorized take and promoting recovery of wolf populations in Idaho.

Thank you for the opportunity to comment on the proposal to reclassify the gray wolf.

Sincerely,

Charles E. Harris, Ph.D.  
President



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## Proposal to Reclassify/Del

# Summary of the Proposal to Reclassify/Delist the Gray Wolf

(This fact sheet is available as a .pdf file)

Gray wolves once roamed most of the North American continent, but by the mid-1900s only a small population remained in the lower 48 states in Minnesota and on Isle Royale, Michigan, and a few non-breeding wolves were observed in the West. Since first listed under the Endangered Species Act (Act) in 1974, recovery programs have helped gray wolf populations rebound. Today, wolf recovery has almost been achieved in the western Great Lakes states. In the West, reintroduced gray wolves in Wyoming and Idaho complement a naturally recovering population in Montana.



These successes have prompted the U.S. Fish and Wildlife Service (Service or we) to propose a change in the status of the gray wolf under the Endangered Species Act. This proposed rule, recently published in the Federal Register, addresses the status of gray wolves in most of the United States and Mexico. It does not affect Mexican gray wolves in the southwestern United States and Mexico, gray wolves in Alaska or Canada, or the red wolf, a separate species found in the Southeast.

### The Proposal

The Service proposal announces the intent to (1) focus future gray wolf recovery efforts only in certain portions of the species= historical range, (2) recognize recovery progress and to adjust the degree of protection under the Act in some of those areas to further promote recovery and (3) eliminate the protections of the Act in the remaining portions of the species= range where recovery actions are not necessary or feasible.

The proposal recommends establishing four gray wolf Adistinct population segments= (DPS) in the Lower 48 States. A DPS is a population that is considered to be partially or completely isolated from other populations and which contributes significantly to the species. Each DPS would be addressed separately based on its current status under the Endangered Species Act.

The Western Great Lakes Gray Wolf Distinct Population Segment includes gray wolves in North Dakota, South Dakota, Minnesota, Wisconsin, and Michigan. Gray wolves throughout this region are currently listed as endangered, except for those in Minnesota, which are listed as threatened, a less critical designation. Gray wolves in this DPS which are currently listed as endangered would be reclassified to threatened. The development of a section 4(d) special rule would allow for lethal control of wolves attacking domestic animals in North Dakota, South Dakota, Michigan, and Wisconsin, similar to the current special rule for Minnesota wolves. Wolves in Minnesota would retain their current legal status of threatened.

The Northeastern Gray Wolf Distinct Population Segment includes wolves that may occur in New Hampshire, New York, Vermont, and Maine. We are proposing to reclassify wolves in these states from Aendangered= to Athreatened,= a status that retains their Federal protection but affords much more flexibility in managing wolves. Threatened status would allow the Service to work closely with state and local governments to investigate various methods to recover wolves in this part of their historical range.

The Western Gray Wolf Distinct Population Segment includes wolves in the states of Washington, Oregon, Idaho, Utah, Montana, Wyoming, Colorado, northern Arizona, and northern New Mexico. The Service=s proposal would give naturally occurring gray wolves in this region, including those in northwestern Montana and wolves thought to inhabit the state of Washington, the designation of threatened. Wolf populations reintroduced in Yellowstone National Park and central Idaho would retain their current nonessential, experimental status.

The Southwestern Gray Wolf Distinct Population Segment includes gray wolves in southern Arizona, southern New Mexico, west Texas, and Mexico. These wolves are listed as endangered and would not be affected by this proposal. Wolves within the existing non-essential, experimental population area would retain their experimental designation.

#### States not included in a Distinct Population Segment

Gray wolves would be delisted in all or portions of those Lower 48 States not otherwise included within the four distinct population segments.

### **Status of Wolves in Each DPS (Basis for Service Proposal)**

Western Great Lakes Gray Wolf DPS. The focus of recovery efforts in the eastern United States has been on wolves in Minnesota. Drafted in 1978 and revised in 1992, the Federal recovery plan provided goals for recovery (delisting) that included the assurance of survival of Minnesota wolves and a recommended state population of 1,251 to 1,400 animals. In addition, the plan called for at least one other viable wolf population outside of Minnesota and Isle Royale National Park, Michigan. During the winter of 1997-98, there were an estimated 2,445 wolves in Minnesota. About 250 wolves in Wisconsin, and 216 in the Upper Peninsula of Michigan (along with 29 on Isle Royale) were counted in late winter of 1999-2000. The Wisconsin-Michigan population constitutes the second viable wolf population called for in the recovery plan. Single animals have also been reported in North and South Dakota, likely dispersing from Minnesota and Canada.

Western Gray Wolf DPS. The recovery plan for wolves in the northern U.S. Rocky Mountains was completed in 1980 and revised in 1987. It sets recovery goals for three recovery areas in the region: northwestern Montana, central Idaho, and the Yellowstone National Park area. If two of these recovery areas support a population of 10 breeding pairs for three years, wolves in the northern Rockies can be reclassified from endangered to threatened. When all three recovery areas maintain 10 breeding pairs (about 100 wolves in each recovery area) for three years, the animals can be delisted.

Wolf numbers have increased steadily throughout the Western DPS. In northwestern Montana, wolves dispersing from Canada established a small population in 1986. Currently the area supports a minimum of 63 wolves in 5 packs. Their numbers are expected to increase in the future. In the Central Idaho reintroduction area, there were at least 141 wolves in 1999, including 10 packs that produced pups. The reintroduced wolves in Yellowstone National Park have also thrived. In the summer of 1999, Yellowstone hosted about 118 wolves, including 8 reproducing packs. This marked the third consecutive year in which at least 20 packs produced pups.

Wolves in other areas within the Western DPS, such as most of Washington and Oregon, are not covered by existing recovery plans. Any wolves in these areas, as part of the Western population segment, would be reclassified from endangered to threatened under this proposal.

#### Southwestern Gray Wolf DPS

The objectives of the Mexican Wolf Recovery Plan called for a captive breeding program to re-establish a population of at least 100 Mexican wolves within its historical range. Through managed breeding, the captive population of Southwestern (Mexican) gray wolves has increased to 182 animals. A total of 43 animals have been released and 22 remained in the wild as of April, 2000. Additional releases are planned over the next two to three years until management goals are reached.

#### Northeastern Gray Wolf DPS

At this time, there is no conclusive evidence that wild gray wolves inhabit the northeastern U.S., although reports of wolves and wolf sign have been received. If this proposal is finalized, the Service will consider developing a recovery plan for the Northeastern DPS.

### **Special Rules**

Under the Endangered Species Act, we can implement special rules for threatened species that give greater management flexibility, if that flexibility promotes conservation of the animal or plant. This type of special rule is currently in effect in Minnesota, permitting designated government agents to trap and kill wolves that have preyed on domestic animals.

The Service is proposing to establish three new special rules. The implementation of a special rule for the Northeastern DPS would allow states and tribes to intentionally or incidentally Atake≅ (harm, kill, harass) wolves if done in compliance with a Service-approved conservation plan.

In Michigan, Wisconsin, North Dakota and South Dakota a special rule would be similar to the existing special

rule for Minnesota wolves, allowing designated government agents to kill wolves that have attacked domestic animals.

A special rule also would be established for the Western DPS. It would only apply to wolves outside of the experimental population areas, and would establish the conditions under which wolves may be harassed, relocated or killed to reduce conflicts with humans. Similar, but more restrictive conditions will continue to apply to wolves within the Rocky Mountain and Southwestern experimental population areas.

### **Evaluating Existing and Future Threats to Gray Wolves**

When we consider placing a plant or animal on the endangered species list, we examine five factors that may be contributing to the species' imperilment: loss of habitat; overuse due to scientific or commercial factors; disease/predation; inadequacy of existing protections; and other human-caused or natural factors. We will look at these same five factors before making a final decision to reclassify or delist gray wolves.

### **Public Comment and Information**

The Service is actively seeking information from the public on its proposal to delist and reclassify gray wolves. Specifically, the Service is interested in information on: future threats to wolf populations in the Lower 48 States and Mexico; the use of special rules to manage gray wolf populations; wolf monitoring methods; and other factors the Service should consider prior to making its final decision.

Comments from interested parties will be considered by the Service if received by November 13, 2000.

Send comments to:

Content Analysis Enterprise Team  
Wolf Comments  
200 East Broadway  
PO Box 7669, Room 301  
Missoula, Montana 59807

or send e-mail to: [GRAYWOLFCOMMENTS@FWS.GOV](mailto:GRAYWOLFCOMMENTS@FWS.GOV)

or fax comments to: 406-329-3021

Informal information meetings are planned across the country to provide details and answer questions on the Service's proposal. In addition, formal public hearings will also be held to receive verbal comments; additional hearings may be requested (deadline for receiving requests is August 28, 2000). The locations, dates, and times of informational meetings and hearings can be obtained by visiting the Service's Web site or by contacting us by phone or email as described below.

The U.S. Fish and Wildlife Service posts information about gray wolf populations on the Internet at <http://midwest.fws.gov/wolf>. Individuals or groups wishing to be placed on the Service's mailing list to obtain updates on the wolf's status can write:

U.S. Fish and Wildlife Service  
Gray Wolf Review  
1 Federal Drive  
Fort Snelling, MN 55111-4056

or use the [GRAYWOLFMAIL@FWS.GOV](mailto:GRAYWOLFMAIL@FWS.GOV) address or call the Service's Gray Wolf Information Line at 612-713-7337.

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U.S. Fish & Wildlife Service



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