



Western Watersheds Project

PO Box 1770
Hailey, ID 83333
tel: (208) 788-2290
fax: (208) 475-4702
email: wwp@westernwatersheds.org
web site: www.westernwatersheds.org

Working to protect and restore Western Watersheds and Wildlife

August 9, 2021

Deputy Director Martha Williams
U.S. Fish and Wildlife Service
1849 C Street Northwest
Washington, D.C. 20240

Re: Addendum to the petition to list a Western DPS of gray wolves

Dear Deputy Director Williams,

Since submitting the petition to list the western North American population of gray wolves (*Canis lupus*) as a Distinct Population Segment on July 29, 2021, we have become aware of one small error with regard to the geographic scope of the 2011 delisting, and a few points that bear additional clarification and elaboration. Those revisions are attached here as an addendum for your consideration as the most accurate and detailed interpretation of the best available science.

We don't believe these clarifications and corrections are significant enough to restart the 90-day timeline for responding to our petition under the Endangered Species Act in accordance with 16 U.S.C. § 1533(b)(3)(A) and we shall continue to consider the petition properly submitted as of July 29, 2021.

Thank you for considering these changes.

Sincerely,

Erik Molvar

Cc: Sec. Deb Haaland, Asst. Sec. Shannon Estenoz

ADDENDUM

August 10, 2021

A PETITION TO LIST THE WESTERN NORTH AMERICAN POPULATION OF GRAY WOLVES (*Canis lupus*) AS A DISTINCT POPULATION SEGMENT

Petition Submitted to the U.S. Secretary of Interior

Acting through the U.S. Fish and Wildlife Service

July 29, 2021

Page 7, full paragraph 3:

Current text: In Oregon, In Washington state, wolves were de-listed east of U.S. Highway 95, State Highway 78, and U.S. 395, and endangered west of these roads.

Replacement text: In Oregon, wolves were delisted in the eastern portion of the state, east of the centerline of Highway 395 and Highway 78 north of Burns Junction, and that portion of Oregon east of the centerline of Highway 95 south of Burns Junction.

Page 28, final paragraph:

Current text: Chapron and Treves (2016) found that legal removals of wolves, although often posited to increase “social tolerance” among local communities, actually was correlated with increased levels of poaching. These researchers concluded that “granting management flexibility for endangered species to address illegal behaviour may instead promote such behaviour.” Similarly, allowing public hunting of wolves does not increase “social tolerance” for the species or reduce poaching. Indeed, Santiago-Avila et al. (2020) found that the delisting of wolves in Wisconsin, triggering the onset of sport hunting, was accompanied by a significant spike in illegal shooting of wolves.

Replacement text: Chapron and Treves (2016) found that legal removals of wolves, although often posited to increase “social tolerance” among local communities, actually was correlated with slow-downs in population growth unrelated to the number of wolves killed legally. They interpreted this as increased rates of poaching. These researchers concluded that “granting management flexibility for endangered species to address illegal behaviour may instead promote such behaviour.” Similarly, allowing public hunting of wolves does not increase “social tolerance” for the species or reduce poaching. Indeed, Santiago-Avila et al. (2020) found that reducing ESA protections was followed by a significant spike in disappearances of wolves that was best explained by cryptic poaching.

Page 32, the first sentence of the first paragraph:

Current text: State wolf policies aimed at reducing populations can have rapid results, potentially overshooting the intended minimum population target (Treves et al. 2021).

Replacement text: State wolf policies aimed at reducing populations can have rapid results, potentially jeopardizing the security of wolf populations and the sustainability of legitimate uses (Treves et al. 2021).

Page 44, final full paragraph:

Existing text: Santiago-Avila et al. (2018) examined the question of the effect of wolf removals on future livestock depredations in Michigan, and found that removal of depredating wolves reduced livestock losses on that particular farm, but increased livestock losses on neighboring farms within 5 km. Overall, there is insufficient scientific support for the use of wolf removals in response to livestock depredations, if reducing livestock depredations (rather than assuaging the feelings of livestock owners through retribution) is the primary policy goal.

Replacement text: Santiago-Avila et al. (2018) examined the effect of wolf removals on future livestock depredations in Michigan, and found that removal of wolves suspected of perdition on domestic ungulates had a net effect of increasing risk for livestock in the region. They found that Michigan's lethal management actions had reduced livestock losses on that particular farm non-significantly, but increased livestock losses on neighboring farms three-fold albeit also not significantly. They also concluded that prior analyses of wolf removal in the Northern Rocky Mountains were irreproducible and not a sound basis for policy. Overall, there is insufficient scientific support for the use of wolf removals in response to predation on domestic animals, if reducing livestock depredations (rather than assuaging the feelings of livestock owners through retribution) is the primary policy goal.