



Wolverine Proposed rules review

2 messages

Jeff Copeland <jcopeland224@gmail.com>
To: Shawn Sartorius <Shawn_Sartorius@fws.gov>

Thu, May 2, 2013 at 11:31 AM

Shawn,

Please find attached my review comments for the Proposed Rule to List the wolverine and the Proposed Rule to establish the 10j.

I made comments on each of the documents in WORD Track Changes format and provided an additional document that includes extended comments. The extended comments for each of the proposed rules are on this single document. I provide notes on the proposed rules that direct you to the extended comments.

While the documents have some issues, which I summarize below, I congratulate you for composing a well researched, comprehensive, and well written life history account of the wolverine and summary of current ecological and management issues.

1. The determination that all Factor A impacts aside from climate change pose no potential threat is a bit problematic. While I would agree that the extent of the threat posed by each is, to some degree, currently indeterminable, the unequivocal finding that no threat exists is not well supported or defended in this document. Justification for the no-threat finding often appears arbitrary and a bit contrived. It would seem that the *Synergistic Interactions Between Threat Factors* section provided an opportunity to at least recognize the potential each of these factors hold in contributing to the threat of climate change. I believe the document would benefit from the inclusion of a bit more uncertainty as to the impact of Factor A impacts beyond climate change.
2. I find it difficult to concur with the conclusion that trapping represents a cumulative DPS-wide threat to the wolverine. While the literature is reasonably clear with respect to the localized impact of wolverine trapping, i.e., trapping mortality is additive and can produce a source-sink dynamic that could destabilize a local population, regulated trapping has not been shown to produce range-wide impacts. Given that trapping is not legal across most of the DPS it is difficult to imagine it as a considerable threat.
3. I can not concur that a 10j designated Nonessential Experimental Population is as necessary as this document suggests. The Proposed Rule states that the artificial establishment of the wolverine within currently unoccupied historical range (Colorado) is not necessary for DPS persistence, while discounting the probability that wolverines will naturally re-establish. While I would agree that the probability of such is low in the near term I so no reason to not expect that it could occur in the future.

I provide more detailed comments on all these issues in the attached review.

Thank you for the opportunity to contribute to this process.

Best regards,

Jeff Copeland

3 attachments



20130118_Wolverine_pL 4d_electronic to FR - Copeland Review.docx

192K

 **20130118_Wolverine 10(j)_electronic to FR - Copeland Review.docx**
479K

 **Proposed rule review extended comments - Copeland.docx**
28K

Sartorius, Shawn <shawn_sartorius@fws.gov>
To: Michel Bagbonon <michel_bagbonon@fws.gov>

Thu, May 2, 2013 at 3:57 PM

Hi Michel,

Please post the attached documents and the transmitting email to both dockets:

FWS-R6-ES-2012-0107

FWS-R6-ES-2012-0106

[Quoted text hidden]

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Shawn Sartorius, Ph.D.
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“[W]hen people thought the Earth was flat, they were wrong. When people thought the Earth was spherical, they were wrong. But if you think that thinking the Earth is spherical is just as wrong as thinking the Earth is flat, then your view is wronger than both of them put together.”

Isaac Asimov

3 attachments

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